

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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LISA BARBOUNIS, : CIVIL ACTION  
Plaintiff, :  
 :  
vs. :  
 :  
MIDDLE EAST FORUM, et al., :  
Defendants. : NO. 2:19-cv-05030-GAM

— — —

Tuesday, November 17, 2020

— — —

Videotaped deposition of DANIEL PIPES,  
taken pursuant to Notice and remotely via Zoom at  
1650 Market Street, Philadelphia, Pennsylvania,  
commencing at 10:08 a.m., and reported  
stenographically by Grace M. Baldino, Professional  
Shorthand Reporter and Notary Public in and for the  
Commonwealth of Pennsylvania.

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- - -

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22 GREGG ROMAN, Defendant  
23 MARC FINK, MEF Representative  
24 LISA BARBOUNIS, Plaintiff  
SIDNEY L. GOLD, Esquire

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- - -

1 INDEX

2 - - -

3 Testimony of: DANIEL PIPES

4 PAGE

5 By Mr. Carson . . . . . 7

6

7 - - -

8 EXHIBITS

9 - - -

10	NUMBER	DESCRIPTION	PAGE MENTIONED
11	Pipes-1	Bylaws	51
12	Pipes-2	Emails	122
13	Pipes-3	Screenshot	63
14	Pipes-4	Audio Recording	75
15	Pipes-5	Emails	176
16	Pipes-6	Emails	189
17	Pipes-7	Emails	218
18	Pipes-8	Emails	242
19	Pipes-9	Emails	--
20	Pipes-10	Emails	251
21	Pipes-11	Audio Recording	275
22	Pipes-12	Emails	292
23	Pipes-13	Emails	316
24	Pipes-14	Emails	320

- - -

EXHIBITS (cont'd)

- - -

	NUMBER	DESCRIPTION	PAGE MENTIONED
1	Pipes-15	Emails	321
2	Pipes-16	Emails	336
3	Pipes-17	Emails	345
4	Pipes-18	Emails	347
5	Pipes-19	Emails	354
6	Pipes-20	Letter	365
7	Pipes-21	Emails	368
8	Pipes-22	Emails	371
9	Pipes-23	Emails	374
10	Pipes-24	Emails	374
11	Pipes-25	Memorandum	379
12	Pipes-26	Emails	406
13	Pipes-27	Emails	408
14	Pipes-28	Emails	417
15	Pipes-29	Text Messages	428

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(It is hereby stipulated and agreed by and among counsel for the respective parties that sealing, certification and filing are waived; and that all objections, except as to the form of the question, be reserved until the time of trial.)

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THE VIDEOGRAPHER: We are now on the record. Today's date is Tuesday, November 17th, 2020, and the time is 10:08 a.m. EST. This is the recorded video deposition of Daniel Pipes in the matter of Lisa Barbounis versus Middle East Forum, et al. in the United States District Court, Eastern District of Pennsylvania, Code No. 2:19-CV-05030-GAM. My name is Luke Zabroske from Everest Court Reporting. I am the video specialist. The court reporter today is Grace Baldino, also from Everest Court Reporting. All counsel appearing today will be noted on the stenographic record. Will the court reporter please swear in the witness.

THE COURT REPORTER: Due to the need for this deposition to take place remotely because

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of the Government's order for social distancing, the parties will stipulate that the court reporter may swear in the witness remotely via videoconference and that the witness has verified that he is, in fact, Daniel Pipes. Will the attorneys please indicate agreement by stating your name and your agreement on the record, beginning with counsel for plaintiff.

MR. CARSON: I represent Lisa Barbounis. My name is Seth Carson.

MR. CAVALIER: Jon Cavalier at Cozen O'Connor representing the Middle East Forum. We agree to that condition, and also I'll note for the record the witness will read and sign.

THE COURT REPORTER: Okay.

MR. RIESER: William Rieser on behalf of Gregg Roman, and I agree to those conditions as well. Thank you.

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DANIEL PIPES, after having been first remotely duly sworn, was examined and testified as follows:

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## EXAMINATION

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BY MR. CARSON:

Q. Mr. Pipes, we're here today to take your deposition in the matter of Lisa Barbounis vs. The Middle East Forum, Gregg Roman, Daniel Pipes, which is you, and we're here today to take your deposition. Have you ever done a deposition before?

A. No.

Q. I'm sorry?

A. No.

Q. Okay. So I think you probably watched enough of these now that you can probably give me the instructions back to me, but I'm just gonna run through them really quickly anyway, and if you have any questions about the deposition, just speak up and ask, and we'll make sure we answer them for you. So the first thing is that it's a question and answer session. We're here today. I'm gonna ask questions. You're gonna provide responses. You can provide any response that you want -- yes, no, "I don't know," "I don't remember," or any other responsive -- or any other responsive answer that you care to provide today, but it's important that

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all your answers be verbal. So nods and shrugs and "uh-huhs" and "uh-uhs," you know, we all kind of do that sometimes. If you do, I may ask you to speak up and just say yes or no. It's just that we're trying to create a clear record, okay?

A. Yes.

Q. Yes?

A. Yes.

Q. Okay. So the second thing is if I ask you a question and you answer the question, we're gonna assume that you understood the question. If there's any questions today that you don't understand, all you have to do is ask me to rephrase or repeat it, and we'll be happy to do that today, okay?

A. Yes.

Q. It's important that we don't speak over each other today. So, especially with Zoom, I think that software only can hear one person talking at a time or record one person talking at a time, so please do me a favor. Let me finish my answer. I promise I'll let you finish your -- let me finish my question. I promise I'll let your finish your response, and we'll try not to drive the court reporter crazy today with interruptions, okay?

Page 9	Page 11
<p>1 A. Yes.</p> <p>2 Q. You've been sworn in, so you're under</p> <p>3 oath. It's important that all your responses be to</p> <p>4 the best -- honest and truthful to the best of your</p> <p>5 ability. Do you understand that?</p> <p>6 A. I do.</p> <p>7 Q. Can you please state your full name for</p> <p>8 the record?</p> <p>9 A. Daniel Pipes.</p> <p>10 Q. And, Mr. Pipes, where do you work?</p> <p>11 A. Middle East Forum.</p> <p>12 Q. And how long have you worked with the</p> <p>13 Middle East Forum?</p> <p>14 A. Twenty-six years.</p> <p>15 Q. How did the Middle East Forum come into</p> <p>16 existence?</p> <p>17 A. I created it with a couple of colleagues.</p> <p>18 Q. Who did you create it with?</p> <p>19 A. Albert Wood, Amy Shargel.</p> <p>20 Q. Can you say those names again, please?</p> <p>21 A. Albert Wood, Amy Shargel.</p> <p>22 Q. Amy Shardelle? Is that S-H-A-R-D-E-L-L-E?</p> <p>23 A. G-E-L.</p> <p>24 Q. Do Albert Wood and Amy Shargel still have</p>	<p>1 Q. The organization is a 501(c)(3); is that</p> <p>2 correct?</p> <p>3 A. Yes.</p> <p>4 Q. What is a 501(c)(3)?</p> <p>5 A. Nonprofit.</p> <p>6 Q. Are there different types of nonprofit</p> <p>7 organizations?</p> <p>8 A. Yes.</p> <p>9 Q. Is there a 501(c)(4)?</p> <p>10 A. Yes.</p> <p>11 Q. Is there a 501(c)(2)?</p> <p>12 A. I don't know.</p> <p>13 Q. So what's the difference between a</p> <p>14 501(c)(3) and a 501(c)(4)?</p> <p>15 A. I don't know. It's a legal matter. You</p> <p>16 can look it up.</p> <p>17 Q. Is the difference have anything to do with</p> <p>18 solicitation or activities with politics?</p> <p>19 A. I'm a specialist on the Middle East, not</p> <p>20 American tax law.</p> <p>21 Q. Do you know the answer?</p> <p>22 A. No. I --</p> <p>23 Q. You don't know what -- so tell me what a</p> <p>24 501(c)(3) is then.</p>
Page 10	Page 12
<p>1 any -- do they still work at the Forum in any</p> <p>2 capacity?</p> <p>3 A. No.</p> <p>4 Q. And when you created the organization 26</p> <p>5 years ago, do you remember the date when it was</p> <p>6 created, by any chance?</p> <p>7 A. January 24th.</p> <p>8 Q. What year?</p> <p>9 A. 1994.</p> <p>10 Q. 1994. And when you created the</p> <p>11 organization on January 24th, 1994, what was the</p> <p>12 type of entity that you created? What's it called?</p> <p>13 A. Middle East Forum.</p> <p>14 Q. So is it called The Middle East Forum? Is</p> <p>15 that the legal name?</p> <p>16 A. No.</p> <p>17 Q. It's Middle East Forum?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And is there a business</p> <p>20 classification for the type of organization that is?</p> <p>21 MR. CAVALIER: Object to form. You can</p> <p>22 answer, Daniel.</p> <p>23 THE WITNESS: 501(c)(3).</p> <p>24 BY MR. CARSON:</p>	<p>1 A. A nonprofit.</p> <p>2 Q. Okay. So what type of nonprofit is it?</p> <p>3 Are you guys allowed to do political work?</p> <p>4 A. No.</p> <p>5 Q. Why not?</p> <p>6 A. Because our status as a 501(c)(3) does not</p> <p>7 allow us to do political work.</p> <p>8 Q. Do you ever consider opening a 501(c)(4)?</p> <p>9 A. Yes.</p> <p>10 Q. When?</p> <p>11 A. In late 2019, early two thousand --</p> <p>12 sorry -- late 2018, early 2019.</p> <p>13 Q. Why did you consider opening a 501(c)(4)?</p> <p>14 A. Because it's useful in itself and because</p> <p>15 it could be a way in which Gregg Roman could be</p> <p>16 helpful to our efforts with that, the complications</p> <p>17 that had arisen.</p> <p>18 Q. In other words, the 501(c)(4) was some --</p> <p>19 strike that. When you were considering -- did you,</p> <p>20 in fact, open a 501(c)(4)?</p> <p>21 A. No.</p> <p>22 Q. Why?</p> <p>23 A. Because he rejoined the 501(c)(3).</p> <p>24 Q. What do you mean by "he rejoined the</p>

Page 13	Page 15
<p>1 501(c)(3)"?</p> <p>2 A. Not exactly rejoined. He became more</p> <p>3 active and more of a participant in the 501(c)(3).</p> <p>4 Q. What do you mean, he became more active in</p> <p>5 the 501(c)(3)?</p> <p>6 A. I was approached by Lisa Barbounis, who</p> <p>7 asked him to return -- asked me to have him return.</p> <p>8 At that point, we proceeded in having him return</p> <p>9 more fully and scuttled the 501(c)(4) idea.</p> <p>10 Q. When did you scuttle the 501(c)(4) idea?</p> <p>11 A. March 2019.</p> <p>12 Q. In March 2018, did you say?</p> <p>13 A. '19.</p> <p>14 Q. '19. So what happened -- so you guys</p> <p>15 don't have any interest in doing work with politics</p> <p>16 anymore?</p> <p>17 MR. CAVALIER: Object to form. You can</p> <p>18 answer.</p> <p>19 THE WITNESS: I don't know what you're</p> <p>20 asking.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Sure. You testified earlier that the</p> <p>23 reason why you were considering opening a 501(c)(4)</p> <p>24 was to allow Gregg to do work in politics, correct?</p>	<p>1 ---</p> <p>2 (Whereupon the court reporter read back</p> <p>3 the pertinent testimony.)</p> <p>4 ---</p> <p>5 BY MR. CARSON:</p> <p>6 Q. Yeah. What complications are you talking</p> <p>7 about?</p> <p>8 A. The -- the wish -- the fact that several</p> <p>9 employees have problems with his management style.</p> <p>10 Q. So what does a 501(c)(4) have to do with</p> <p>11 his management style?</p> <p>12 A. It would be a separate organization.</p> <p>13 Q. Would it be underneath the Middle East</p> <p>14 Forum?</p> <p>15 A. No.</p> <p>16 Q. Would it have anything to do with the</p> <p>17 Middle East Forum?</p> <p>18 A. No.</p> <p>19 Q. It would be a completely separate</p> <p>20 organization that has nothing to do with the Middle</p> <p>21 East Forum? That's your testimony?</p> <p>22 A. That's what the law is, I believe, that a</p> <p>23 501(c)(4) is separate from a 501(c)(3), though many</p> <p>24 organizations have both. As far as I know, they're</p>
Page 14	Page 16
<p>1 A. No, I didn't say that.</p> <p>2 Q. Why did you consider opening a 501(c)(4)?</p> <p>3 MR. CAVALIER: Object to form. You can</p> <p>4 answer.</p> <p>5 THE WITNESS: Because it seemed like a</p> <p>6 good idea and looking for a way for Gregg to be</p> <p>7 part of the organization without the</p> <p>8 complications that had arisen.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. Without what complications? You gotta</p> <p>11 speak up, Mr. Pipes.</p> <p>12 MR. CAVALIER: Seth, I can hear him fine.</p> <p>13 MR. CARSON: I can't, and I think --</p> <p>14 MR. CAVALIER: Can the court reporter hear</p> <p>15 him okay?</p> <p>16 THE COURT REPORTER: He's a little quiet</p> <p>17 to me, too.</p> <p>18 MR. CAVALIER: Okay. Daniel --</p> <p>19 MR. CARSON: You can't hear him fine,</p> <p>20 either, so just -- I mean, he has to speak up,</p> <p>21 period.</p> <p>22 THE WITNESS: What's your question?</p> <p>23 MR. CARSON: Can you read back my</p> <p>24 question, please? I don't remember.</p>	<p>1 ---</p> <p>2 separate. We never did it, so I don't know the law.</p> <p>3 You can check the lawbooks.</p> <p>4 Q. I'm asking about your intention, though.</p> <p>5 Who was gonna be the -- who were gonna be the</p> <p>6 members of the 501(c)(4) when you were considering</p> <p>7 starting one?</p> <p>8 A. What do you mean by "members"?</p> <p>9 Q. Who were gonna be the officers?</p> <p>10 A. I don't know. We never got that far.</p> <p>11 Q. When you start a organization like a</p> <p>12 501(c)(3), do you have to -- does an individual have</p> <p>13 to be listed to start the organization?</p> <p>14 A. Check the lawbooks. I don't know.</p> <p>15 Q. Well, were you listed when you started the</p> <p>16 501(c)(3)?</p> <p>17 MR. CAVALIER: Object to form.</p> <p>18 THE WITNESS: We did not start. We were</p> <p>19 planning --</p> <p>20 BY MR. CARSON:</p> <p>21 Q. Sorry?</p> <p>22 A. We were planning it. We did not start it.</p> <p>23 Q. All right. So when you were planning on</p> <p>24 starting the 501(c)(4), was it your intention that</p> <p>the 501(c)(4) be connected to the 501(c)(3) in some</p>



Page 17	Page 19
<p>1 capacity?</p> <p>2 MR. CAVALIER: Object to form.</p> <p>3 THE WITNESS: What does "connected" mean?</p> <p>4 MR. CARSON: Involved with.</p> <p>5 MR. CAVALIER: Same objection.</p> <p>6 THE WITNESS: I don't know what "involved</p> <p>7 with" means.</p> <p>8 BY MR. CARSON:</p> <p>9 Q. Well, do you know -- do you want me to</p> <p>10 look up the definition of "involved"? What part</p> <p>11 don't you understand?</p> <p>12 A. I know English, but I don't know what you</p> <p>13 mean in this case.</p> <p>14 Q. Was there gonna be a relationship between</p> <p>15 the 501(c)(3), the Middle East Forum that you are</p> <p>16 working with now, and the 501(c)(4)?</p> <p>17 MR. CAVALIER: Object to form. Asked and</p> <p>18 answered.</p> <p>19 THE WITNESS: We were gonna --</p> <p>20 MR. CARSON: What're you talking about,</p> <p>21 asked and answered? He said he doesn't know</p> <p>22 what I mean.</p> <p>23 THE WITNESS: We were gonna follow the</p> <p>24 legal requirements, whatever those are, and I'm</p>	<p>1 not a specialist on these laws. Check your</p> <p>2 lawbooks to find out what the --</p> <p>3 BY MR. CARSON:</p> <p>4 Q. My question is about your intention --</p> <p>5 A. You're not to interrupt me, Mr. Carson.</p> <p>6 You're not to interrupt me. Isn't that the rule of</p> <p>7 this?</p> <p>8 Q. My question is about your intention,</p> <p>9 Mr. Pipes.</p> <p>10 A. I thought I am answering, and when I</p> <p>11 answer, you be quiet. Is that not the rule? Tell</p> <p>12 me.</p> <p>13 Q. I'm asking about your intentions,</p> <p>14 Mr. Pipes.</p> <p>15 A. Answer my question. Are you gonna</p> <p>16 interrupt me, or you gonna let me speak?</p> <p>17 Q. You can proceed. I don't answer your</p> <p>18 questions today.</p> <p>19 A. Well, then, I'm not gonna answers yours.</p> <p>20 Q. That's actually not how it works.</p> <p>21 A. Well, it's gonna work that way.</p> <p>22 Q. If you need a break --</p> <p>23 A. You're not gonna interrupt me.</p> <p>24 Q. If you need to stop and talk to your</p>
Page 18	Page 20
<p>1 not capable of telling you what those are.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. You answer's nonresponsive. My question</p> <p>4 is, did you have an intention for the 501(c)(4) to</p> <p>5 work with the 501(c)(3)?</p> <p>6 MR. CAVALIER: Object to form. Asked and</p> <p>7 answered. Argumentative. Dan, you can answer,</p> <p>8 and, again --</p> <p>9 MR. CARSON: Jon, if you keep doing it,</p> <p>10 we're gonna get on the phone with Judge Wolson</p> <p>11 quick. Please, you're not gonna interrupt my</p> <p>12 deposition all day with nonsense objections.</p> <p>13 MR. CAVALIER: The irony of that statement</p> <p>14 coming from --</p> <p>15 MR. CARSON: You're not -- you're just not</p> <p>16 gonna do it, all right? You're not gonna do</p> <p>17 it.</p> <p>18 MR. CAVALIER: Call the judge.</p> <p>19 MR. CARSON: So just stop.</p> <p>20 MR. CAVALIER: Daniel, if you can answer</p> <p>21 the question, feel free to do so.</p> <p>22 THE WITNESS: We were planning it. There</p> <p>23 are complicated laws about what you can and</p> <p>24 can't do. We didn't go through with it. I'm</p>	<p>1 lawyer --</p> <p>2 A. I don't need to stop. You're not gonna</p> <p>3 interrupt me.</p> <p>4 MR. CAVALIER: Let him finish his answer,</p> <p>5 Seth. Daniel, to the extent you can answer the</p> <p>6 question, go ahead and try your best to answer</p> <p>7 it again.</p> <p>8 THE WITNESS: What is the question?</p> <p>9 BY MR. CARSON:</p> <p>10 Q. The question is, was the 501(c)(4) gonna</p> <p>11 be related in any way with this 501(c)(3)?</p> <p>12 A. What does "related" mean?</p> <p>13 Q. Involved with, related, connected to. Was</p> <p>14 there gonna be any relationship between the two</p> <p>15 organizations?</p> <p>16 MR. CAVALIER: Same objection. Daniel --</p> <p>17 BY MR. CARSON:</p> <p>18 Q. Were they gonna work together? Were they</p> <p>19 gonna have the same staff? Was there any</p> <p>20 relationship between the two? It's a simple</p> <p>21 question. Yes or no?</p> <p>22 MR. CAVALIER: Same objection. Daniel, to</p> <p>23 the extent you can answer, go ahead.</p> <p>24 THE WITNESS: One, it never happened, and,</p>



Page 21	Page 23
<p>1 two, I don't know the complex laws between --</p> <p>2 of relations between threes and fours off the</p> <p>3 top of my head. So I cannot answer that.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. Well, do you remember when you were gonna</p> <p>6 open a 501(c)(4)? Do you remember that? Do you</p> <p>7 remember what your intentions were at that time?</p> <p>8 A. Open a 501(c)(4).</p> <p>9 Q. Did you have any intentions with regard to</p> <p>10 the type of organization the 501(c)(4) was gonna</p> <p>11 have with the 501(c)(3)? We're just wasting time --</p> <p>12 ---</p> <p>13 (Indistinguishable cross-talk.)</p> <p>14 ---</p> <p>15 THE WITNESS: Are you gonna interrupt me</p> <p>16 again?</p> <p>17 MR. CARSON: These aren't trick questions,</p> <p>18 Mr. Pipes. We're just wasting time by --</p> <p>19 MR. CAVALIER: Just let him try to answer</p> <p>20 the question.</p> <p>21 THE WITNESS: I will not be interrupted by</p> <p>22 you, Mr. Carson.</p> <p>23 MR. CARSON: Okay.</p> <p>24 THE WITNESS: I'm not interrupting you.</p>	<p>1 threatened to stop the deposition three times</p> <p>2 in the first 20 minutes.</p> <p>3 MR. CAVALIER: Don't answer the question,</p> <p>4 Daniel. You're not under any kind of order</p> <p>5 here today.</p> <p>6 MR. CARSON: Yes, he is.</p> <p>7 MR. CAVALIER: Ask your question, Seth.</p> <p>8 You're under an order. I'm under an order.</p> <p>9 Daniel Pipes is not under any orders --</p> <p>10 MR. CARSON: You're an agent of Mr. Pipes.</p> <p>11 That's a funny characterization of the court's</p> <p>12 order, but I guess we can clear it up pretty</p> <p>13 easily, but it would --</p> <p>14 MR. CAVALIER: Well, I guess we should</p> <p>15 probably not talk about compliance with court</p> <p>16 orders on the record. So if you have a</p> <p>17 question --</p> <p>18 MR. CARSON: Got no problem talking about</p> <p>19 it.</p> <p>20 MR. CAVALIER: Ask the question, and we'll</p> <p>21 go forward.</p> <p>22 MR. CARSON: Read my last question.</p> <p>23 ---</p> <p>24 (Whereupon the court reporter read back</p>
Page 22	Page 24
<p>1 You don't interrupt me. Can I be clear on</p> <p>2 that? I'm not gonna proceed with this if you</p> <p>3 keep interrupting me. Do you understand?</p> <p>4 BY MR. CARSON:</p> <p>5 Q. You do know you're under court order</p> <p>6 today, right, Mr. Pipes, to be here?</p> <p>7 A. You do understand that you're not supposed</p> <p>8 to interrupt me?</p> <p>9 Q. Are you aware that there's a court order</p> <p>10 for you to be here today, Mr. Pipes?</p> <p>11 A. I am.</p> <p>12 MR. CAVALIER: I object to the --</p> <p>13 THE WITNESS: Are you aware there's a</p> <p>14 court order that requires you be here, too,</p> <p>15 Mr. Carson?</p> <p>16 BY MR. CARSON:</p> <p>17 Q. Mr. Pipes, what do you know about the</p> <p>18 court order today that has you appearing today for a</p> <p>19 deposition?</p> <p>20 MR. CAVALIER: Hold on a second. Hold on</p> <p>21 a second, Daniel. Don't answer that. That's a</p> <p>22 gross mischaracterization of the order. It's</p> <p>23 completely irrelevant.</p> <p>24 MR. CARSON: It's not irrelevant. He now</p>	<p>1 the pertinent testimony.)</p> <p>2 ---</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. Who was gonna be involved in the 501(c)(4)</p> <p>6 besides Gregg Roman?</p> <p>7 A. [Inaudible].</p> <p>8 Q. Sorry?</p> <p>9 A. Only him.</p> <p>10 Q. How were you gonna pay Gregg Roman when he</p> <p>11 started working with the 501(c)(4)?</p> <p>12 MR. CAVALIER: Object to form. You can</p> <p>13 answer.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. How was he gonna be compensated?</p> <p>16 A. We did not get that far.</p> <p>17 Q. You didn't talk to anyone about how</p> <p>18 Mr. Roman was gonna be compensated when he began</p> <p>19 working with the 501(c)(4)?</p> <p>20 A. No.</p> <p>21 Q. The answer is no?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. How far did you get?</p> <p>24 A. We talked to potential donors.</p>

Page 25	Page 27
<p>1 Q. What else did you do?</p> <p>2 A. We looked into the legalities.</p> <p>3 Q. How did you look into legalities?</p> <p>4 A. I don't remember.</p> <p>5 Q. What do you mean, you don't know?</p> <p>6 A. I --</p> <p>7 Q. How do you know you did it then?</p> <p>8 A. "I don't remember" is a simple English</p> <p>9 phrase that I think you understand.</p> <p>10 Q. Well, are you sure you looked into the</p> <p>11 legalities if you don't remember how you did it?</p> <p>12 A. I remember discussion about legalities.</p> <p>13 Q. Who was the discussion with? Who was --</p> <p>14 ---</p> <p>15 (Indistinguishable cross-talk.)</p> <p>16 ---</p> <p>17 THE WITNESS: Gregg.</p> <p>18 BY MR. CARSON:</p> <p>19 Q. Who else was present when you held this</p> <p>20 discussion?</p> <p>21 A. I don't remember.</p> <p>22 Q. Did you hold discussions about the</p> <p>23 501(c)(4) and 501(c)(3) with anyone else besides</p> <p>24 Gregg?</p>	<p>1 A. What do you mean?</p> <p>2 Q. Is he paid a salary? Is he paid by the</p> <p>3 hour? Is he paid by the year?</p> <p>4 A. A salary.</p> <p>5 Q. He's paid a salary? What's his salary?</p> <p>6 A. I don't know.</p> <p>7 Q. Who knows what his salary is?</p> <p>8 A. The accountant.</p> <p>9 Q. Who's the accountant?</p> <p>10 A. [Inaudible].</p> <p>11 THE COURT REPORTER: What was the --</p> <p>12 THE WITNESS: The accountant. I don't</p> <p>13 remember the name of the accountant. Her name</p> <p>14 is Amy, but I forget her last name and the</p> <p>15 company.</p> <p>16 BY MR. CARSON:</p> <p>17 Q. Amy? Is Amy an employee of the Middle</p> <p>18 East Forum?</p> <p>19 A. No. This is a different Amy from the</p> <p>20 first Amy. No, she's not employee. She works for</p> <p>21 accounting company that does our accounting.</p> <p>22 Q. Okay. Does the Middle East Forum have a</p> <p>23 bookkeeper?</p> <p>24 A. No. I mean, yes, the company. Not an</p>
Page 26	Page 28
<p>1 A. Marc Fink.</p> <p>2 Q. How about anybody else besides Gregg and</p> <p>3 Marc Fink?</p> <p>4 A. I don't think so.</p> <p>5 Q. Did you hold discussions with Lisa</p> <p>6 Barbounis about it?</p> <p>7 A. Who is "you"?</p> <p>8 Q. You, Mr. Pipes, are you.</p> <p>9 A. I don't believe so, no.</p> <p>10 Q. Did you hold discussions with Patricia</p> <p>11 McNulty about it?</p> <p>12 A. Believe so.</p> <p>13 Q. Did you hold discussions with Marnie Meyer</p> <p>14 about it?</p> <p>15 A. Don't believe so.</p> <p>16 Q. How is Gregg Roman paid?</p> <p>17 MR. CAVALIER: Object to form. You can</p> <p>18 answer.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. I can set it up. Is Gregg Roman employee</p> <p>21 of the Middle East Forum?</p> <p>22 A. Yes.</p> <p>23 Q. How is he paid? How does the Middle East</p> <p>24 Forum compensate Gregg Roman?</p>	<p>1 individual.</p> <p>2 Q. What's the name of the company?</p> <p>3 A. I don't remember.</p> <p>4 Q. What do you mean, you don't -- can you</p> <p>5 look it up? We can stop, and you can look it up.</p> <p>6 A. I can look it up, yeah.</p> <p>7 MR. CAVALIER: We're not doing that, Seth.</p> <p>8 MR. CARSON: Yeah. I need to know the</p> <p>9 name of the company that does the bookkeeping.</p> <p>10 MR. CAVALIER: Then send an interrogatory</p> <p>11 or ask another witness.</p> <p>12 MR. CARSON: I'm asking --</p> <p>13 BY MR. CARSON:</p> <p>14 Q. What's your -- what's your position with</p> <p>15 the Middle East Forum?</p> <p>16 A. President.</p> <p>17 Q. So who decided to retain this company that</p> <p>18 does the accounting?</p> <p>19 A. Let me make a point now that will be --</p> <p>20 that I'll be coming back to over and over again.</p> <p>21 Middle East Forum has about 25 employees. Each one</p> <p>22 of them does a specialized task. I do not do what</p> <p>23 all the other 25 do. I can't do all the things they</p> <p>24 do. I provide leadership. I provide intellectual</p>

Page 29	Page 31
<p>1 underpinnings. I'm not engaged in the details of  2 employment, finances, legal, office management,  3 technology, and so forth. So you will find on many  4 occasions, when you ask me specifics, I will not  5 know. This does not mean I am not the CEO. This  6 does not mean I don't make the ultimate decisions,  7 but it does mean that others make many decisions  8 along the way and just check with -- sometimes on  9 their own, and sometimes they check with me.</p> <p>10 Q. Are you the CEO?  11 A. Are you interrupting me again?  12 Q. Are you the CEO?  13 ---  14 (Indistinguishable cross-talk.)  15 ---  16 MR. CAVALIER: Hold on. Daniel, finish  17 your answer.  18 BY MR. CARSON:  19 Q. You don't have to finish your answer.  20 Your answer is totally nonresponsive anyway.  21 A. I can't believe it.  22 ---  23 (Indistinguishable cross-talk.)  24 ---</p>	<p>1 Mr. Pipes?  2 A. I'm not answering that. I'm gonna finish  3 my statement.  4 MR. CAVALIER: Finish what -- finish your  5 answer, Daniel, and then we can move on.  6 THE WITNESS: I am the head of the Middle  7 East Forum. I do not do all the jobs. There  8 are 25 --  9 BY MR. CARSON:  10 Q. Mr. Pipes, you said all this already.  11 A. All right. But you --  12 Q. Is there something that you wanna add to  13 your answer?  14 A. Interrupting me again?  15 MR. CAVALIER: Seth, if you keep  16 interrupting him, we are gonna stop.  17 MR. CARSON: I think we should. I think  18 you should have a conversation with your client  19 about how depositions --  20 MR. CAVALIER: No. I mean we're gonna  21 stop for the whole day.  22 MR. CARSON: That's not gonna happen, Jon,  23 so don't even try threatening, okay, because  24 it's --</p>
Page 30	Page 32
<p>1 ---  2 THE COURT REPORTER: Guys, we gotta do one  3 at a time, all right?  4 BY MR. CARSON:  5 Q. Are you the CEO of the Middle East Forum?  6 A. You gonna interrupt me?  7 Q. Mr. Pipes, are you the CEO of the Middle  8 East Forum?  9 A. Are you gonna interrupt me, Mr. Carson?  10 ---  11 (Indistinguishable cross-talk.)  12 ---  13 MR. CARSON: I'm happy to give you guys  14 time if you wanna sit down and have a  15 conversation with your client about  16 depositions.  17 THE WITNESS: I don't need any time. I  18 want you to --  19 MR. CAVALIER: I think he's entitled to  20 ask you not to interrupt him and let him finish  21 his answer. I mean, that's what we've been  22 doing. I let Lisa go on for pages of the  23 transcript.  24 BY MR. CARSON:  25 Q. Are you the CEO of the Middle East Forum,</p>	<p>1 ---  2 ---  3 (Indistinguishable cross-talk.)  4 ---  5 MR. CAVALIER: -- and we'll move on.  6 BY MR. CARSON:  7 Q. Mr. Pipes, do you have something new to  8 say to your answer, because you don't have to go and  9 repeat the whole thing again. We have the record.  10 We can read it back if we need to.  11 A. I am not going to be interrupted. Is that  12 clear? And I wanna say what I wanna say.  13 Q. Okay. Are you done?  14 A. No, I'm not done.  15 Q. Okay. Do you wanna finish? Go ahead.  16 A. I wanna finish.  17 Q. Please only provide new information that  18 you haven't --  19 A. I will tell you what I want to tell you,  20 and you will listen. That's the deal.  21 Q. Are you the CEO of the Middle East Forum,  22 Mr. Pipes?  23 A. As I was saying, I am the head of the  24 organization, which means I provide leadership and,  25 in many cases, take the ultimate decision, but I</p>

Page 33	Page 35
<p>---</p> <p>1 don't take all the decisions, and I don't know all 2 that's going on. This does not mean I am unaware. 3 It means that I am filling my job as CEO, as the 4 president. So when you ask me about the accounting 5 and how we decided it, Gregg, who is the COO, he 6 chose the company, he told me about the various 7 companies, and he got my okay to go with a company 8 whose name I don't remember.</p> <p>9 Q. So Gregg Roman knows who this accounting 10 company is? Is that your testimony? 11 A. You have to ask him. 12 Q. Well, I'm asking you. Does Gregg Roman 13 know who they are? 14 MR. CAVALIER: Object to form. 15 THE WITNESS: I don't know what Gregg 16 Roman knows and doesn't know. 17 BY MR. CARSON: 18 Q. Okay. Do you know who they are? 19 A. I told you I do not know -- 20 MR. CAVALIER: Object to form. 21 BY MR. CARSON: 22 Q. Have you ever worked with them before? 23 A. What does "work with them before" mean? 24 Q. Have you ever worked with them before?</p>	<p>---</p> <p>1 A. Amy's the person that the Forum works with 2 most closely. 3 Q. The person at the Forum who works with 4 who? 5 A. Most closely. 6 Q. With what? 7 A. Most closely. 8 Q. Amy's the person at the Forum that you 9 work with most closely? That's your testimony? 10 MR. CAVALIER: Objection. That's not what 11 he said, Seth. 12 MR. CARSON: I -- well, it'd be nice if I 13 could hear him, Jon. 14 MR. CAVALIER: I can hear him fine. 15 MR. CARSON: Well, does it matter if you 16 can hear him fine if I can't? 17 MR. CAVALIER: Turn your computer up. I 18 don't know what to tell you. 19 MR. CARSON: My computer's up all the way. 20 You have to speak up, Mr. Pipes. 21 THE WITNESS: Get a better computer, Mr. 22 Carson. 23 MR. CARSON: If we're gonna have problem 24 with the technology today, then we're gonna</p>
Page 34	Page 36
<p>---</p> <p>1 A. I don't know what you mean. Be specific. 2 Q. I'm not being specific. I'm being 3 general. In your entire life, have you ever worked 4 with the accounting company who does the books for 5 the Middle East Forum? 6 A. Since they started working with us, yes. 7 Q. So when did they start working with you? 8 A. Early 2020. 9 Q. What's the date? 10 A. Early 2020. 11 Q. Who chose them? 12 A. Gregg looked at several companies and, in 13 the end, decided on this one, checked with me, so I 14 said okay. 15 Q. Do you have one person there, or do you 16 have more than one person that you work with? 17 A. I don't know. 18 Q. Who's the contact that you've talked with 19 there? 20 A. I don't know. 21 Q. Is her name Amy? 22 A. I don't talk to anyone. 23 Q. Well, who's Amy? When you testified about 24 Amy, who's that?</p>	<p>---</p> <p>1 have to do something about it, but you have to 2 speak up. You're whispering. 3 THE WITNESS: I'm speaking at normal 4 voice. 5 MR. CARSON: No, you're not. 6 MR. CAVALIER: I'm not gonna let you do 7 that, Seth. 8 MR. CARSON: Jon, stop telling me what 9 you're gonna do and what you're not gonna do, 10 okay? Seriously. 11 MR. CAVALIER: All right. We're gonna 12 take a break. 13 MR. CARSON: Maybe while on the break you 14 can have your client speak up when he comes 15 back because this is getting ridiculous. It's 16 just ridiculous. This is not how depositions 17 are supposed -- 18 MR. CAVALIER: There are lots of things 19 that are ridiculous about this case, Seth. 20 We're going off the record. 21 MR. CARSON: That's not an excuse, Jon. 22 Get your client in order, man. 23 THE VIDEOGRAPHER: We are now off the 24 record.</p>



Page 37	Page 39
<p>1 --- 2 --- 3 (Whereupon there was a recess in the 4 proceeding from 10:35 a.m. to 10:45 a.m.) 5 --- 6 THE VIDEOGRAPHER: The time is 10:45 a.m. 7 Eastern Time. We are now on the record. Thank 8 you for your patience, guys. Apologize. 9 BY MR. CARSON: 10 Q. Who approved how much money Gregg Roman 11 was paid for the Middle East Forum? 12 A. I decided with the chairman of the 13 executive committee. 14 Q. When did you make that decision? 15 A. I do it annually. 16 Q. So you -- when did it happen last? 17 A. In late 2019 or early 2020. 18 Q. And how much money did you approve this 19 year? 20 A. I don't remember. 21 Q. For Gregg's salary? 22 A. I don't remember. 23 Q. Okay. Why don't you remember? 24 MR. CAVALIER: Object to form. THE WITNESS: We do a lot of the things,</p>	<p>1 --- 2 A. What do you mean? 3 Q. Where do you keep the donations after 4 they're made? 5 A. We have a bank account. 6 Q. Okay. Do you guys invest the donations, 7 or you just keep them all in a bank account? How 8 does that work? 9 A. A mix. 10 Q. Did you say a mix? 11 A. A mix. 12 Q. So how much money does the Middle East 13 Forum have invested? 14 A. I don't know. 15 Q. Well, when's the last time you checked? 16 A. Month ago. 17 Q. I'm sorry? 18 A. Month ago. 19 Q. You checked a month ago? 20 A. Yeah. I looked at the account. 21 Q. Okay. So a month ago, what did it say? 22 A. I don't know. I do not memorize numbers. 23 Q. Well, ballpark it approximately. 24 A. I -- I can't. Q. Why not?</p>
Page 38	Page 40
<p>1 --- 2 and I do not recall them months and years 3 later, the numbers. 4 BY MR. CARSON: 5 Q. Do you get paid through the Middle East 6 Forum? 7 A. I do get paid. 8 Q. How much do you get paid? 9 A. I can't give you an exact number. 10 Q. Well, give me a ballpark. 11 A. 240,000. 12 Q. \$240,000 a year? 13 A. Yeah. 14 Q. And how much money does the Middle East 15 Forum take in donations every year? 16 MR. CAVALIER: Object to form. 17 THE WITNESS: I can't remember. 18 BY MR. CARSON: 19 Q. Well, give me a ballpark. 20 A. There's a 990 form that you can go and 21 look it up. 22 Q. What's a 990 form? 23 A. It's an IRS form for nonprofits. 24 Q. Does the Middle East Forum have an account where they keep the donations?</p>	<p>1 --- 2 A. I don't remember. It's easy enough to 3 look up. 4 Q. Okay. So where would you go to look that 5 up? 6 A. I would go to the company that has our 7 money invested. 8 Q. What company is that? 9 A. Raymond James. 10 Q. Raymond James? 11 A. Yep, and PNC, and maybe others smaller 12 amounts. 13 Q. How long have you been working with 14 Raymond James? 15 A. Four years. 16 Q. And the portfolio that you keep with 17 Raymond James, does that include stocks and bonds? 18 A. I believe so. 19 Q. How about you? What are you worth? 20 MR. CAVALIER: Object to form. 21 THE WITNESS: None of your business. 22 MR. CARSON: No, it actually is our 23 business. It goes to punitive damages. 24 MR. CAVALIER: Personally? Daniel, you don't have to answer that question.</p>

Page 41	Page 43
<p>---</p> <p>1 MR. CARSON: No, he does have to answer</p> <p>2 it.</p> <p>3 MR. CAVALIER: He's not going to.</p> <p>4 MR. CARSON: Well, then we're gonna call</p> <p>5 Judge Wolson, okay?</p> <p>6 MR. CAVALIER: Hold up.</p> <p>7 MR. CARSON: That's no problem. We will.</p> <p>8 It goes directly to punitive damages.</p> <p>9 MR. CAVALIER: Daniel Pipes' personal net</p> <p>10 worth goes to punitive damages?</p> <p>11 MR. CARSON: It absolutely does. How can</p> <p>12 a jury calculate punitive damages, and how do</p> <p>13 they know what's punitive unless they know what</p> <p>14 he's worth? It absolutely go -- the case law</p> <p>15 is pretty clear.</p> <p>16 MR. RIESER: Seth, you can't -- you have</p> <p>17 no claim for punitive damages against --</p> <p>18 MR. CARSON: Yes, we do. He's a defendant</p> <p>19 in the case, and we made a claim for punitive</p> <p>20 damages.</p> <p>21 MR. CAVALIER: -- recognize that theory,</p> <p>22 Seth.</p> <p>23 MR. RIESER: Seth, under the PHRA there is</p> <p>24 no punitive damages, okay?</p>	<p>---</p> <p>1 with everything at once, and we'll get all</p> <p>2 those questions answered before the end of the</p> <p>3 deposition, so I'll just keep a list here. I</p> <p>4 mean, I'd be happy to send you the case law.</p> <p>5 MR. CAVALIER: Okay.</p> <p>6 MR. CARSON: It's well settled.</p> <p>7 MR. CAVALIER: I will look forward to it.</p> <p>8 MR. CARSON: I mean, we -- I'll send it to</p> <p>9 you on the next break. Maybe then we can</p> <p>10 resolve it without getting the judge involved,</p> <p>11 but if the judge gets involved, in the Third</p> <p>12 Circuit, these questions are highly relevant.</p> <p>13 I just had the same argument the other day in</p> <p>14 one so -- but, again, I'll give you the</p> <p>15 opportunity to give your client the right</p> <p>16 advice.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. How much money did the Middle East Forum</p> <p>19 receive in donations in 2019?</p> <p>20 A. I don't know.</p> <p>21 Q. Where is that listed?</p> <p>22 A. In the -- it will be listed in the 2019</p> <p>23 990, which is now being worked on.</p> <p>24 Q. 2019 990?</p>
Page 42	Page 44
<p>---</p> <p>1 MR. CARSON: First of all, under the</p> <p>2 Philadelphia Fair Practice Ordinance, there are</p> <p>3 punitive damages.</p> <p>4 MR. CAVALIER: Not against --</p> <p>5 ---</p> <p>6 (Indistinguishable cross-talk.)</p> <p>7 ---</p> <p>8 MR. CARSON: Yeah, there are, and under</p> <p>9 the PHRA there's liquidated damages.</p> <p>10 MR. RIESER: Well, number one, there</p> <p>11 isn't.</p> <p>12 MR. CARSON: Yeah, there is.</p> <p>13 MR. RIESER: It has nothing to do with his</p> <p>14 net worth.</p> <p>15 MR. CARSON: No, it absolutely does.</p> <p>16 MR. RIESER: It doesn't. Then call the</p> <p>17 judge. It's stupid. Go ahead.</p> <p>18 MR. CARSON: It's not stupid.</p> <p>19 MR. CAVALIER: He's not gonna answer your</p> <p>20 questions about his personal net worth.</p> <p>21 MR. CARSON: I mean, it's not really a</p> <p>22 choice, but I'm just gonna make a list.</p> <p>23 MR. CAVALIER: Well, I'm instructing --</p> <p>24 MR. CARSON: I'll call the judge and deal</p>	<p>---</p> <p>1 A. Yep.</p> <p>2 Q. Do you notify members of the board about</p> <p>3 Middle East Forum's stock portfolio, investment</p> <p>4 portfolio?</p> <p>5 A. What do you mean by "members of the</p> <p>6 board"?</p> <p>7 Q. Well, the Middle East Forum has board</p> <p>8 members; is that correct?</p> <p>9 A. What do you mean by "board"?</p> <p>10 Q. Board of directors.</p> <p>11 A. We don't have a board of directors.</p> <p>12 Q. What do you guys have in place of a board</p> <p>13 of directors?</p> <p>14 A. I don't know. What do you mean?</p> <p>15 Q. You tell me. What do you think I mean?</p> <p>16 A. I don't know what you mean. You tell me</p> <p>17 what your question is.</p> <p>18 Q. My question is, does the Middle East Forum</p> <p>19 have a board of directors?</p> <p>20 A. No.</p> <p>21 Q. Does the Middle East Forum have a Board of</p> <p>22 Governors?</p> <p>23 A. [Inaudible].</p> <p>24 Q. We can't hear you. You gotta speak up.</p>

Page 45	Page 47
<p>1 A. Yes.</p> <p>2 Q. Who's on the Board of Governors?</p> <p>3 A. About 60, 70 people.</p> <p>4 Q. Are there officers on the Board of</p> <p>5 Governors?</p> <p>6 A. No.</p> <p>7 Q. Does the Middle East Forum have corporate</p> <p>8 officers?</p> <p>9 A. Yes.</p> <p>10 Q. Who are they?</p> <p>11 A. Steven Levy and Lawrence Hollin and</p> <p>12 myself, Gregg, and one or two others.</p> <p>13 Q. Who are the other people?</p> <p>14 A. I don't remember.</p> <p>15 Q. What's Steve Levy's position?</p> <p>16 A. He's chairman.</p> <p>17 Q. What's Lawrence Hollin's position?</p> <p>18 A. I don't remember.</p> <p>19 Q. What?</p> <p>20 A. I don't remember.</p> <p>21 Q. What's Daniel Pipes' position? Do you</p> <p>22 remember your position?</p> <p>23 A. Might be president; might be something</p> <p>24 else.</p>	<p>1 (Indistinguishable cross-talk.)</p> <p>2 ---</p> <p>3 THE WITNESS: Could the court reporter</p> <p>4 read me back what I said?</p> <p>5 ---</p> <p>6 (Whereupon the court reporter read back</p> <p>7 the pertinent testimony.)</p> <p>8 ---</p> <p>9 (Indistinguishable cross-talk.)</p> <p>10 ---</p> <p>11 THE COURT REPORTER: Guys, we gotta do one</p> <p>12 at a time here.</p> <p>13 BY MR. CARSON:</p> <p>14 Q. Are you the CEO, is the next --</p> <p>15 MR. CAVALIER: Daniel, do you wanna finish</p> <p>16 your prior answer?</p> <p>17 THE WITNESS: I do.</p> <p>18 MR. CAVALIER: Then go ahead and do it.</p> <p>19 THE WITNESS: The important title is</p> <p>20 president, and I have another title as -- in</p> <p>21 the corporate structure but --</p> <p>22 BY MR. CARSON:</p> <p>23 Q. What's that title?</p> <p>24 MR. CAVALIER: Daniel, were you finished</p>
Page 46	Page 48
<p>1 Q. Well, what's your understanding of what it</p> <p>2 is?</p> <p>3 A. I just told you. I don't -- might be</p> <p>4 president; might be something else.</p> <p>5 Q. Well, what might else [sic] it be if it's</p> <p>6 not president?</p> <p>7 A. I don't -- it's not an important title.</p> <p>8 My important title is I'm president of the</p> <p>9 organization, and I have --</p> <p>10 Q. Are you -- are you the CEO?</p> <p>11 A. -- interrupting me. You're inter --</p> <p>12 Q. Are you the CEO?</p> <p>13 MR. CAVALIER: Seth, let him finish his</p> <p>14 answer.</p> <p>15 BY MR. CARSON:</p> <p>16 Q. Are you the CEO?</p> <p>17 MR. CAVALIER: Hold on a second. Daniel,</p> <p>18 were you finished your last answer?</p> <p>19 MR. CARSON: He was finished.</p> <p>20 BY MR. CARSON:</p> <p>21 Q. Are you the CEO?</p> <p>22 MR. CAVALIER: Daniel, don't answer the</p> <p>23 question.</p> <p>24 ---</p>	<p>1 your answer?</p> <p>2 BY MR. CARSON:</p> <p>3 Q. What's that title?</p> <p>4 MR. CAVALIER: Daniel, were you finished</p> <p>5 your answer?</p> <p>6 THE WITNESS: Could the court reporter</p> <p>7 read back to me what I said?</p> <p>8 THE COURT REPORTER: Guys, we're not gonna</p> <p>9 do this all day, just so you know, okay?</p> <p>10 MR. CAVALIER: I agree with you, and I</p> <p>11 apologize on behalf of --</p> <p>12 MR. CARSON: Then why don't you just --</p> <p>13 why don't you like -- please, just do what</p> <p>14 everyone does before a deposition when they</p> <p>15 have a client, and explain to your client the</p> <p>16 way the deposition works.</p> <p>17 MR. CAVALIER: The way the deposition</p> <p>18 works is you ask your question. He --</p> <p>19 MR. CARSON: I ask questions. He provides</p> <p>20 answers.</p> <p>21 MR. CAVALIER: If you're not gonna let him</p> <p>22 answer the question, there's no point for any</p> <p>23 of us to be here.</p> <p>24 BY MR. CARSON:</p>



Page 49	Page 51
<p>---</p> <p>1 Q. Are you also the CEO? It's a simple --</p> <p>2 MR. CAVALIER: That's not a question</p> <p>3 pending. He wants to finish his answer --</p> <p>4 MR. CARSON: It is the question --</p> <p>5 MR. CAVALIER: -- finish his answer before</p> <p>6 we move on to the next question, Seth. No</p> <p>7 matter how many times you try to talk over him,</p> <p>8 he's gonna finish his answers.</p> <p>9 MR. CARSON: That's good advice, Jon.</p> <p>10 BY MR. CARSON:</p> <p>11 Q. Are you the CEO?</p> <p>12 MR. CAVALIER: Daniel, do you wanna finish</p> <p>13 your prior answer?</p> <p>14 THE WITNESS: I do.</p> <p>15 BY MR. CARSON:</p> <p>16 Q. Go ahead, Mr. Pipes. What's so important</p> <p>17 that you need to get it out? Go ahead. Finish.</p> <p>18 A. The important title I have is as president</p> <p>19 of the Middle East Forum. I have perhaps that and</p> <p>20 perhaps some other title in the corporate structure.</p> <p>21 I don't remember it. It's not important.</p> <p>22 Q. Is it CEO?</p> <p>23 A. It is not CEO.</p> <p>24 Q. Well, what is it?</p>	<p>---</p> <p>1 Q. Are there MEF bylaws?</p> <p>2 A. Yes.</p> <p>3 Q. Is your other title listed in the MEF</p> <p>4 bylaws?</p> <p>5 A. I don't know.</p> <p>6 Q. Do you wanna look at them?</p> <p>7 A. If you want me to.</p> <p>8 Q. Sure, we can look at the MEF bylaws. Do</p> <p>9 you see this document I put on the screen?</p> <p>10 A. Yep.</p> <p>11 Q. Okay. Are these the MEF bylaws?</p> <p>12 A. I don't know.</p> <p>13 Q. We'll take a minute and review it.</p> <p>14 MR. CAVALIER: Seth, do you really want</p> <p>15 him to review the entire bylaws [inaudible] --</p> <p>16 MR. CARSON: I mean, the question I'm</p> <p>17 asking is, are these the bylaws?</p> <p>18 THE WITNESS: I can only --</p> <p>19 ---</p> <p>20 (Indistinguishable cross-talk.)</p> <p>21 ---</p> <p>22 BY MR. CARSON:</p> <p>23 Q. You review it until you have enough</p> <p>24 information to answer the question.</p>
Page 50	Page 52
<p>---</p> <p>1 A. I don't know. It could be president; it</p> <p>2 could be something else.</p> <p>3 Q. Well, what else do you think it might be?</p> <p>4 A. I don't know.</p> <p>5 Q. Well, why do you think this other title</p> <p>6 exists then?</p> <p>7 A. There's a legal need for corporate</p> <p>8 structure.</p> <p>9 Q. Is there a document to look at where this</p> <p>10 other title is listed?</p> <p>11 A. I'm sure there is.</p> <p>12 Q. Well, what's that document?</p> <p>13 A. I don't know.</p> <p>14 Q. Is it the Middle East Forum charter?</p> <p>15 A. I don't know. If you want to look up our</p> <p>16 paperwork, our public paperwork, be glad to make it</p> <p>17 available to you.</p> <p>18 Q. That's not necessary. You already have</p> <p>19 made it available.</p> <p>20 A. I deal with the Middle East, Mr. Carson.</p> <p>21 I don't deal with the legalities of the Middle East</p> <p>22 Forum. I can give you dates what happened in the</p> <p>23 11th century. I cannot give you specifics of</p> <p>24 legalities of corporate governance of a 501(c)(3).</p>	<p>---</p> <p>1 A. Then let me read the entire document.</p> <p>2 Q. If you're gonna read the whole thing,</p> <p>3 we're gonna go off the record while you read it.</p> <p>4 A. Up to you.</p> <p>5 MR. CARSON: We're gonna go off the record</p> <p>6 while we read this. We're not wasting time to</p> <p>7 read the whole document.</p> <p>8 MR. CAVALIER: I disagree. We're not -- I</p> <p>9 mean, you wanna go off the record, we'll go off</p> <p>10 the record, but you're not stopping the clock</p> <p>11 while the witness reviews the document you put</p> <p>12 in front of him.</p> <p>13 MR. CARSON: Yes, we are stopping the</p> <p>14 clock.</p> <p>15 ---</p> <p>16 (Indistinguishable cross-talk.)</p> <p>17 ---</p> <p>18 MR. CAVALIER: Seth, that's not how it</p> <p>19 works.</p> <p>20 MR. CARSON: Yeah, it is how it works.</p> <p>21 MR. CAVALIER: You want him to identify a</p> <p>22 19-page document, he's gotta look at the</p> <p>23 document.</p> <p>24 MR. CARSON: It's not 19 pages.</p>

Page 53	Page 55
<p>1 ---</p> <p>2 ---</p> <p>3 (Indistinguishable cross-talk.)</p> <p>4 ---</p> <p>5 BY MR. CARSON:</p> <p>6 Q. Have you ever seen this document before,</p> <p>7 Mr. Pipes?</p> <p>8 A. I don't know. I have to see the whole of</p> <p>9 it before I --</p> <p>10 Q. Well, let me ask you a question: How did</p> <p>11 these documents get to your attorney? Did you turn</p> <p>12 them over?</p> <p>13 A. I did not, no.</p> <p>14 Q. Who turned them over?</p> <p>15 A. I don't know.</p> <p>16 Q. Well, do you know that documents were</p> <p>17 turned over to your attorneys in this case?</p> <p>18 A. No.</p> <p>19 Q. You don't know whether you turned</p> <p>20 documents over to your attorneys in this case?</p> <p>21 A. No.</p> <p>22 Q. Okay.</p> <p>23 A. We have a legal counsel who handles these</p> <p>24 things.</p> <p>Q. Who handled the turning over of documents</p>	<p>1 ---</p> <p>2 MR. CAVALIER: You're gonna call the</p> <p>3 judge?</p> <p>4 MR. CARSON: Yes.</p> <p>5 MR. CAVALIER: Because you don't want the</p> <p>6 witness to be able to read the document you're</p> <p>7 presenting --</p> <p>8 MR. CARSON: No. We're not gonna spend an</p> <p>9 hour where he reads a four-page document and</p> <p>10 tell me we're on the clock.</p> <p>11 MR. CAVALIER: Not gonna take an hour.</p> <p>12 MR. CARSON: That's not gonna happen, all</p> <p>13 right, and we're also not gonna pretend like we</p> <p>14 don't know that these are -- the document is</p> <p>15 labeled "MEF Bylaws," so we're not playing</p> <p>16 games today. So either you wanna talk to your</p> <p>17 client, or I'm just gonna call the judge, and</p> <p>18 the judge will make a ruling.</p> <p>19 MR. CAVALIER: If you wanna call the judge</p> <p>20 and tell him that you don't want the witness to</p> <p>21 be able to read the documents that you're</p> <p>22 putting in front of him --</p> <p>23 MR. CARSON: I -- that's no problem.</p> <p>24 MR. CAVALIER: Feel free.</p> <p>THE VIDEOGRAPHER: Counsels, are we agreed</p>
Page 54	Page 56
<p>1 ---</p> <p>2 in this case?</p> <p>3 A. You interrupted me. Legal --</p> <p>4 Q. Who turned over the document -- handing</p> <p>5 over the documents in this case? I didn't hear you.</p> <p>6 A. I'd like to finish. My legal counsel</p> <p>7 handles matters such as documents to lawyers and to</p> <p>8 opposing counsel and so forth. I do not deal with</p> <p>9 this. I will note again that we have 25 people at</p> <p>10 the Forum, and we have specialized tasks, and I</p> <p>11 don't do everything, and I don't know everything</p> <p>12 that goes on. I make key decisions. I do not make</p> <p>13 every single decision such as whether to hand over</p> <p>14 bylaws to lawyers or not. So I don't know how these</p> <p>15 went -- if these are, in fact, our bylaws -- how</p> <p>16 they went from us --</p> <p>17 Q. Well, how would you tell if they were?</p> <p>18 A. I would have to read this document, and</p> <p>19 I'd have to compare it to the documents -- the</p> <p>20 document in my possession that says --</p> <p>21 MR. CARSON: Then we're gonna call the</p> <p>22 judge, Jon. This is bullshit. We're gonna</p> <p>23 call the judge. We're not gonna spend an hour</p> <p>24 reading a document and staying on the clock, so</p> <p>I'm gonna get Judge Wolson on the phone.</p>	<p>1 ---</p> <p>2 to go off the record while --</p> <p>3 MR. CARSON: No, let's stay on the record.</p> <p>4 THE VIDEOGRAPHER: Sure thing, Seth.</p> <p>5 THE DEPUTY: Good morning. Judge Wolson's</p> <p>6 chambers. This is Jeannine.</p> <p>7 MR. CARSON: Yeah. This is Seth Carson.</p> <p>8 We're calling from a deposition in connection</p> <p>9 with the Middle East Forum verse -- I'm</p> <p>10 sorry -- Lisa Barbounis verse the Middle East</p> <p>11 Forum. We're just having an issue with the</p> <p>12 witness just being completely nonresponsive,</p> <p>13 refusing to even verify documents as simple as</p> <p>14 the Middle East Forum bylaws. We're dealing</p> <p>15 with the president of the Middle East Forum,</p> <p>16 and I don't know what to do, but they're --</p> <p>17 counsel's telling me that he needs to sit and</p> <p>18 take -- to read, you know, documents that are</p> <p>19 four or five pages long and that we need to</p> <p>20 stay on the record to do it, and that's gonna</p> <p>21 count against the clock, and it's just -- we</p> <p>22 only have one opportunity to do this</p> <p>23 deposition, and it's just getting out of</p> <p>24 control.</p> <p>THE DEPUTY: Okay. Unfortunately, the</p>

Page 57	Page 59
<p>---  1 judge is in the middle of a telephone  2 conference. Can you hold on for just a moment?  3 MR. CARSON: Sure.  4 THE DEPUTY: Thanks.  5 MR. CARSON: Your client can take as much  6 time as he wants to read documents today, but  7 we're just not gonna do it and count against  8 the clock. Not gonna spend two hours looking  9 at doc -- because there's gonna be a lot of  10 documents that are coming up, and we're not  11 gonna do that every time. It's ridiculous, and  12 I'm -- frankly, I'm sort of surprised that you  13 would even suggest it.  14 THE DEPUTY: Mr. Carson?  15 MR. CARSON: Yup.  16 THE DEPUTY: Okay. As I said, the judge  17 is in the middle of a Rule 16. I don't know if  18 you wanna try calling back, I wanna say, maybe  19 like 11:45?  20 MR. CARSON: Yeah. I can keep asking --  21 yeah. I can keep asking other questions, and  22 then we can call the judge back. It's just  23 like, you know, the first document that I put  24 in front of the witness, you know, he said he</p>	<p>---  1 he wants to read this document, or we can keep  2 going and we can --  3 MR. CAVALIER: It's your deposition. To  4 the extent you want him to review documents or  5 to ask -- if you wanna ask him questions about  6 documents --  7 MR. CARSON: I'm gonna ask him questions  8 about this document, but first -- my first  9 question, is this the Middle East Forum bylaws?  10 Your client says "I don't know," which is --  11 it's ridiculous.  12 MR. CAVALIER: He needs to read the  13 document to identify it.  14 MR. CARSON: Right.  15 MR. CAVALIER: I don't know why that's  16 such a controversial statement to you.  17 BY MR. CARSON:  18 Q. All right. Let's just time it just for  19 fun. You go ahead, Mr. Pipes. Wanna read the  20 document before you confirm it? Is this the Middle  21 East Forum bylaws, is the question. Let us know  22 when you're ready to answer.  23 A. I'm finished with this.  24 Q. So is it the MEF -- is it Middle East</p>
Page 58	Page 60
<p>---  1 needs to take his time and read the entire  2 document before he answers any questions on it.  3 There's gonna be a lot of documents in the  4 case, so I suggested that [inaudible] hours  5 while he confirms documents, that's fine. He  6 can take all the time he wants to do that, but  7 they're trying to say that it has to count  8 against the clock, and that's -- you know what  9 I mean? It's just -- that's just patently  10 unfair, and it's clearly a strategy designed to  11 reduce the amount of questions that I'm  12 permitted to ask today.  13 MR. CAVALIER: For defense counsel, I'll  14 just note that I disagree with everything  15 Mr. Carson just said.  16 MR. CARSON: Yeah, of course you do.  17 THE DEPUTY: Okay. I would suggest that  18 you both, you know, dial in around 11:45, and I  19 could see if the judge can speak to you all at  20 one time.  21 MR. CARSON: Thank you. We'll call back.  22 I'll just keep going for now. Thank you.  23 THE DEPUTY: No problem. Thank you.  24 MR. CARSON: We can go off the record if</p>	<p>---  1 Forum's bylaws?  2 A. I'm finished with the first page.  3 MR. CAVALIER: Read the whole document.  4 THE WITNESS: No, no, no. First page, the  5 first section that you showed me. No, go back  6 up. Come on.  7 MR. CAVALIER: Still not all the way --  8 BY MR. CARSON:  9 Q. Tell me where to go.  10 A. To the bottom -- look at the first page --  11 Q. You just said you read the first page.  12 A. First page in the sense of first screen.  13 Q. This was the first screen, so I went down  14 to the second screen.  15 A. No, no, no. Up. Okay.  16 Q. Can you read Section I for the record out  17 loud, please? I'll highlight it for you. Can you  18 read the section out loud for the record?  19 A. Middle East Forum shall have two Boards of  20 Governors, one based in Philadelphia, and the other,  21 New York. Each shall consist of no less than 15  22 persons and no more than 45 persons or such other  23 members -- or such other number of the members of  24 each board shall, from time to time, determine.</p>

Page 61	Page 63
<p>---</p> <p>1 Q. So is that the Board of Governors that you</p> <p>2 were just testifying to?</p> <p>3 MR. CAVALIER: So, just so we're clear for</p> <p>4 the record, are you withdrawing the question</p> <p>5 that the witness was answering and moving on to</p> <p>6 other --</p> <p>7 BY MR. CARSON:</p> <p>8 Q. I'm asking you if this is the board of</p> <p>9 directors -- the Board of Governors that we just</p> <p>10 talked about.</p> <p>11 A. Well, we haven't verified that this is our</p> <p>12 bylaws, so if you're just asking me, in general, is</p> <p>13 there a Board of Governors, yes, there is.</p> <p>14 Q. Does this document state that the Middle</p> <p>15 East Forum shall have two Boards of Governors?</p> <p>16 A. I don't know what this document is. I --</p> <p>17 Q. Well, does this document say that? The</p> <p>18 Middle East Forum will have two Boards of Governors.</p> <p>19 Is that what it says?</p> <p>20 A. This document says that. Whatever this</p> <p>21 document --</p> <p>22 Q. Why does the Middle East Forum have two</p> <p>23 Boards of Governors? What does that mean?</p> <p>24 MR. CAVALIER: Object to form. You can</p>	<p>---</p> <p>1 A. Yes.</p> <p>2 Q. The website has a page that's listed,</p> <p>3 "Middle East Forum Board of Governors". Are you</p> <p>4 aware of that?</p> <p>5 A. Yes.</p> <p>6 Q. And Gregg Roman's name is listed on that</p> <p>7 page. Do you know that?</p> <p>8 A. No. I think that's wrong.</p> <p>9 Q. Have you ever seen this web page before?</p> <p>10 A. Let me see the whole of it.</p> <p>11 Q. Do you see here where it says "Middle East</p> <p>12 Forum Board of Governors"?</p> <p>13 A. Yep.</p> <p>14 Q. Do you see here where it says Gregg</p> <p>15 Roman's name underneath that?</p> <p>16 A. Yup.</p> <p>17 Q. So does that better help your memory of</p> <p>18 whether Gregg Roman's a member of the Board of</p> <p>19 Governors?</p> <p>20 A. Well, I haven't verified this page, but if</p> <p>21 we just look at this page, it's quite clear that the</p> <p>22 top five names are officers, and the next 12 or so</p> <p>23 names are executive committee, and then comes the</p> <p>24 Board of Governors. And if Gregg's name is on the</p>
Page 62	Page 64
<p>---</p> <p>1 answer.</p> <p>2 THE WITNESS: Middle East Forum does not</p> <p>3 have two Board of Governors.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. Well, how many Boards of Governors does</p> <p>6 the Middle East Forum have?</p> <p>7 A. One.</p> <p>8 Q. So this document says one is based in</p> <p>9 Philly, and the other's in New York. Was there ever</p> <p>10 a time when the Middle East Forum had two Boards of</p> <p>11 Governors?</p> <p>12 A. Yes.</p> <p>13 Q. When did they go from having two to one?</p> <p>14 A. Five years ago.</p> <p>15 Q. When did Gregg Roman become a member of</p> <p>16 the Board of Governors?</p> <p>17 A. He didn't.</p> <p>18 Q. Gregg Roman doesn't sit on the Board of</p> <p>19 Governors?</p> <p>20 A. No.</p> <p>21 Q. Is Gregg Roman a corporate officer?</p> <p>22 A. Yes.</p> <p>23 Q. You have a website online. Are you aware</p> <p>24 of that?</p>	<p>---</p> <p>1 Board of Governors, that would be a surprise to me.</p> <p>2 Q. And I'll represent to you that this --</p> <p>3 this is what your website looks like right now. I</p> <p>4 just took a screenshot of it just now.</p> <p>5 A. Well, I just explained to you that if it</p> <p>6 does -- it says that Gregg is secretary of the</p> <p>7 organization, and the Board of Governors are below</p> <p>8 it.</p> <p>9 Q. And if we look at the Middle East Forum</p> <p>10 bylaws, there is a section for officers, correct,</p> <p>11 right here?</p> <p>12 A. I don't know that this is the Middle East</p> <p>13 Forum bylaws.</p> <p>14 Q. We can pretend it's not for now. Is there</p> <p>15 a section in this document that says "officers"?</p> <p>16 A. Yes.</p> <p>17 Q. You are aware that your attorneys turned</p> <p>18 this over to us and represented that it's the Middle</p> <p>19 East Forum bylaws, correct?</p> <p>20 A. No.</p> <p>21 Q. I'll represent to you that that's exactly</p> <p>22 what happened. Do you see this little number right</p> <p>23 here? Do you see this?</p> <p>24 A. I do.</p>



Page 65	Page 67
<p>1 Q. Do you know what that's called? It's</p> <p>2 called a Bates stamp. I'll represent to you that</p> <p>3 your attorneys put this number on this page and</p> <p>4 turned it over to us in connection with our requests</p> <p>5 in this case. Did you know that?</p> <p>6 A. No.</p> <p>7 Q. Your attorneys never talked to you about</p> <p>8 discovery?</p> <p>9 MR. CAVALIER: Objection. Daniel, you</p> <p>10 don't have to --</p> <p>11 ---</p> <p>12 (Indistinguishable cross-talk.)</p> <p>13 ---</p> <p>14 MR. CARSON: You can just say</p> <p>15 "privileged," Jon. It's fine.</p> <p>16 MR. CAVALIER: Yeah.</p> <p>17 MR. CARSON: Objection, privilege.</p> <p>18 BY MR. CARSON:</p> <p>19 Q. Okay. So did you ever work on producing</p> <p>20 discovery in this case in any way?</p> <p>21 A. No.</p> <p>22 MR. CAVALIER: Object to form.</p> <p>23 BY MR. CARSON:</p> <p>24 Q. Did you ever have to respond to -- do you</p>	<p>1 responses to requests for production of</p> <p>2 documents, right?</p> <p>3 MR. CAVALIER: Sure.</p> <p>4 MR. CARSON: So you do know that you</p> <p>5 represented that this is the Middle East Forum</p> <p>6 bylaws, correct?</p> <p>7 MR. CAVALIER: Listen. I'm not -- the</p> <p>8 discovery speaks for itself --</p> <p>9 ---</p> <p>10 (Indistinguishable cross-talk.)</p> <p>11 ---</p> <p>12 MR. CARSON: I get it, I get it. It's</p> <p>13 fine.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. So you are aware that this document does</p> <p>16 have a section called "Officers," correct,</p> <p>17 Mr. Pipes?</p> <p>18 A. I see in front of me it says "Officers,"</p> <p>19 yes.</p> <p>20 Q. And these -- chairman, vice chairman,</p> <p>21 president, vice president, secretary, treasurer, are</p> <p>22 those the offices that the Middle East Forum</p> <p>23 maintains for its officers?</p> <p>24 MR. CAVALIER: Object to the form of the</p>
Page 66	Page 68
<p>1 know what interrogatories are?</p> <p>2 A. No.</p> <p>3 Q. Do you know what a request for production</p> <p>4 of documents is?</p> <p>5 A. No.</p> <p>6 Q. So you've never responded to</p> <p>7 interrogatories, then? Is that your testimony?</p> <p>8 MR. CAVALIER: Objection.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. Have you ever responded to</p> <p>11 interrogatories?</p> <p>12 A. No.</p> <p>13 Q. Have you ever responded to a request for</p> <p>14 production of documents?</p> <p>15 A. No.</p> <p>16 Q. Well, do you see how this document here,</p> <p>17 which your attorneys are representing to us is the</p> <p>18 Middle East Forum bylaws, do you see it has a</p> <p>19 section for "officers"?</p> <p>20 MR. CAVALIER: I'm gonna object to the</p> <p>21 description of the document, but to the extent</p> <p>22 you can answer the question, go ahead.</p> <p>23 MR. CARSON: You -- Jon, you do know that</p> <p>24 you guys gave us written requests -- written</p>	<p>1 question.</p> <p>2 THE WITNESS: I'd have to check.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. Where would you check?</p> <p>5 A. I would check our documents.</p> <p>6 Q. Would you check with the Middle East Forum</p> <p>7 bylaws?</p> <p>8 A. No. I would check to see what our current</p> <p>9 officers are.</p> <p>10 Q. Well, what document would you check that</p> <p>11 would tell you that?</p> <p>12 A. I would check the internal documents of</p> <p>13 the Middle East Forum.</p> <p>14 Q. Well, what are the internal documents you</p> <p>15 would check? Please identify one.</p> <p>16 A. We keep lists of who is doing what.</p> <p>17 Q. And is one of those lists have a job</p> <p>18 called -- a position called secretary?</p> <p>19 A. Yeah. I told you that. Gregg is the</p> <p>20 secretary.</p> <p>21 Q. Okay. And Gregg is also the director of</p> <p>22 the Middle East Forum, correct?</p> <p>23 A. Correct.</p> <p>24 Q. Is there any position at the Middle East</p>

Page 69	Page 71
<p>1 Forum that's higher than director in the corporate 2 structure? 3 A. I'm the president of the -- making -- I'm 4 the president. Yeah. 5 Q. So it's your testimony that you are 6 positioned higher in the corporate structure than 7 the director of the Middle East Forum? 8 A. Yes. 9 Q. Is there anybody else who's positioned 10 higher? 11 A. The chairman is the highest position in 12 the corporate structure. 13 Q. Who's the chairman? 14 A. Steven Levy. 15 Q. So Steven Levy is positioned above you in 16 the corporate structure; is that your testimony? 17 A. Yes. 18 Q. When did he become the chairman? 19 A. I don't remember. 20 Q. Well, how long have you worked with Steve 21 Levy for? 22 A. I don't remember. 23 Q. We can't hear you when you whisper, 24 Mr. Pipes.</p>	<p>1 of taking his penis out in front of her? 2 MR. CAVALIER: I'm gonna object to the 3 form there. 4 BY MR. CARSON: 5 Q. We can listen to the recording if you'd 6 like, Mr. Pipes. 7 A. I don't know that. 8 Q. We can do that on the record. 9 A. If you like. 10 Q. Sorry? What's your answer? 11 A. If you like. 12 Q. Well, did you know that she accused Gregg 13 Roman of taking his penis out in front of her at a 14 bar in Washington D.C.? 15 MR. CAVALIER: Object to the form. 16 THE WITNESS: No, I don't. 17 BY MR. CARSON: 18 Q. You didn't know that? 19 A. No. I know that -- no, I don't know that. 20 Q. If you knew that, would you have 21 investigated it? 22 A. I am not now or at any time in the next 23 few hours going to deal with hypotheticals. If 24 you --</p>
Page 70	Page 72
<p>1 A. I don't remember. 2 Q. Did you start working with him this year? 3 A. No. 4 Q. Did you start working with him last year? 5 A. Earlier. 6 Q. Early last year is when you began working 7 with Mr. Levy; is that your testimony? 8 A. I've worked with him for some years. I 9 cannot be precise when I first -- 10 Q. Did you work with him at all times related 11 to the allegations in this case? 12 A. Yes. 13 Q. Did you work with him while Tiffany Lee 14 was still an employee of the Middle East Forum? 15 A. Probably. 16 Q. Did you work with him while Gabrielle 17 Bloom was still an employee of the Middle East 18 Forum? 19 A. I don't know who Gabrielle Bloom is. 20 Q. Do you know who Alana Goodman is? 21 A. I know the name as a reporter. 22 Q. You know the name what? 23 A. As a reporter. 24 Q. Do you know that she accused Gregg Roman</p>	<p>1 Q. That's -- 2 A. Let me finish. 3 Q. That's not a choice you have today, 4 Mr. Pipes. 5 A. Let me finish. 6 MR. CAVALIER: Let him finish his answer. 7 MR. CARSON: His answer was, I'm not now 8 gonna deal with hypotheticals today. 9 BY MR. CARSON: 10 Q. That's not a choice that you have today, 11 Mr. Pipes. You have to answer the questions 12 honestly and truthfully to the best of your ability. 13 You don't get to decide if there's an entire 14 category of questions that you're not gonna respond 15 to. 16 --- 17 (Indistinguishable cross-talk.) 18 --- 19 MR. CARSON: So will not answer 20 hypotheticals. Okay. 21 BY MR. CARSON: 22 Q. Did you wanna tell me anything else about 23 how you will not answer hypotheticals? 24 MR. CAVALIER: Is that a question?</p>

Page 73	Page 75
<p>---</p> <p>1 THE WITNESS: Read me back what I started</p> <p>2 to say.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. You said, I will not now or today respond</p> <p>5 to hypotheticals. Is there something else you</p> <p>6 wanted to say in response to that?</p> <p>7 A. In each case, it's a matter of when,</p> <p>8 where, who, and other specifics, and, therefore,</p> <p>9 answering hypotheticals is a mistake, and I'm not</p> <p>10 gonna engage in it.</p> <p>11 Q. Well, at 11:45 we're gonna talk to the</p> <p>12 judge, and if he instructs you to answer</p> <p>13 hypotheticals, will you answer them?</p> <p>14 MR. CAVALIER: Objection.</p> <p>15 THE WITNESS: If you give me specifics</p> <p>16 about who, when, where, and every detail, then</p> <p>17 I can perhaps make a judgment, but I can't make</p> <p>18 a judgment [inaudible].</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Another nonresponsive answer, okay. So if</p> <p>21 you would've known that there was an allegation --</p> <p>22 whether it was true or not, if you just would've</p> <p>23 heard that there's an allegation that the director</p> <p>24 of the Middle East Forum took his penis out in front</p>	<p>---</p> <p>1 MR. CAVALIER: Object to form.</p> <p>2 THE WITNESS: If Gregg Roman said he would</p> <p>3 give stories to a reporter, is that within the</p> <p>4 purview? Yes.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. Because one of the jobs of the director of</p> <p>7 the Middle East Forum is to work with the press; is</p> <p>8 that correct?</p> <p>9 A. Correct.</p> <p>10 Q. If Gregg Roman said he's gonna trade those</p> <p>11 stories for sex, is that something that's within the</p> <p>12 purview of the director of the Middle East Forum?</p> <p>13 A. No.</p> <p>14 Q. So if you found out that he was making</p> <p>15 propositions to reporters to trade stories for sex,</p> <p>16 is that something you think you should've</p> <p>17 investigated?</p> <p>18 A. Depends on the exact circumstances.</p> <p>19 Q. I'm gonna play a recording that was turned</p> <p>20 over to your attorneys in the course and scope of</p> <p>21 discovery.</p> <p>22 ---</p> <p>23 (Whereupon an audio recording was played</p> <p>24 from 11:20 a.m. to 11:31 a.m.)</p>
Page 74	Page 76
<p>---</p> <p>1 of a Washington Examiner reporter, is that something</p> <p>2 that you think you should've investigated?</p> <p>3 A. It depends on the specifics -- when,</p> <p>4 where, who, what the relations were, what the</p> <p>5 background is, and so forth. I'm not gonna make a</p> <p>6 determination on the abstract.</p> <p>7 Q. Under what context would it be appropriate</p> <p>8 for the director of the Middle East Forum to take</p> <p>9 his penis out in front of a Washington Examiner</p> <p>10 reporter?</p> <p>11 MR. CAVALIER: Object to form. We're</p> <p>12 getting close to starting to hear instructions</p> <p>13 from me not to answer, Seth.</p> <p>14 MR. CARSON: Yeah. Based on what,</p> <p>15 privilege?</p> <p>16 MR. CAVALIER: No. Based on the fact that</p> <p>17 these questions are ludicrous.</p> <p>18 MR. CARSON: They're not ludicrous.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Mr. Pipes, tell me -- so I'll give you a</p> <p>21 context. If Gregg Roman was telling a Washington</p> <p>22 Examiner reporter that he would give her stories, is</p> <p>23 that something that would be within the purview of</p> <p>24 the director of the Middle East Forum?</p>	<p>---</p> <p>1 ---</p> <p>2 BY MR. CARSON:</p> <p>3 Q. Have you ever heard that recording before,</p> <p>4 Mr. Pipes?</p> <p>5 A. No.</p> <p>6 Q. Is that a recording that you would've been</p> <p>7 interested in hearing?</p> <p>8 MR. CAVALIER: Objection. Form,</p> <p>9 foundation.</p> <p>10 BY MR. CARSON:</p> <p>11 Q. Is that something you wished you would've</p> <p>12 known that someone alleged?</p> <p>13 MR. CAVALIER: Same objections.</p> <p>14 THE WITNESS: I don't know if this is</p> <p>15 legal recording. I don't know if this is</p> <p>16 legitimate recording. I don't know if this</p> <p>17 person speaking was paid to act this out. I</p> <p>18 know nothing about it.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Forgetting about the truth of anything</p> <p>21 said, wouldn't that be something you'd wanna be</p> <p>22 aware of?</p> <p>23 MR. CAVALIER: Objection. Form,</p> <p>24 foundation, incomplete hypothetical. You can</p>



Page 77	Page 79
<p>---</p> <p>1 answer if you can.</p> <p>2 THE WITNESS: I'm the president of the</p> <p>3 Middle East Forum.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. Right.</p> <p>6 A. Interrupt me.</p> <p>7 Q. You're the president of Middle East Forum.</p> <p>8 Continue.</p> <p>9 A. I am not the den mother of the Middle East</p> <p>10 Forum. The employees at the Forum engage in all</p> <p>11 sorts of activities that I know nothing about that I</p> <p>12 probably wouldn't approve of. If this is accurate,</p> <p>13 I wouldn't approve of it. If I learned that Lisa</p> <p>14 Barbounis goes and picks up men at a dinner, takes</p> <p>15 them back to her hotel room, and has sex with them</p> <p>16 that night, probably wouldn't approve of that</p> <p>17 either. These are not my concerns. I do not deal</p> <p>18 with the personal lives of my staff. I don't know</p> <p>19 them in that way. I'm not concerned with their</p> <p>20 activities. If they do something that I don't like</p> <p>21 and I know about it, I'll tell them, but I am not</p> <p>22 den mother of the Middle East Forum.</p> <p>23 Q. But don't you have a legal duty to the</p> <p>24 employees who've worked with Gregg Roman?</p>	<p>---</p> <p>1 position, other than you, to make sure that the</p> <p>2 female employees who work for the Middle East Forum</p> <p>3 aren't subjected to illegal conduct?</p> <p>4 MR. CAVALIER: Object to form, foundation.</p> <p>5 THE WITNESS: I have yet [inaudible].</p> <p>6 THE COURT REPORTER: I'm sorry, Mr. Pipes.</p> <p>7 I cannot hear you.</p> <p>8 THE WITNESS: I have yet to be shown</p> <p>9 illegal conduct, and that illegal conduct is</p> <p>10 specific in time and place.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. Well --</p> <p>13 A. What illegal conduct have you shown me?</p> <p>14 Q. Is sexual harassment illegal conduct?</p> <p>15 A. I don't know that what was described in</p> <p>16 that tape recording of unknown providence with</p> <p>17 unknown people is illegal activity. If it is, I</p> <p>18 would be concerned, but I didn't know about it, and</p> <p>19 I, at this point, have my doubts about its</p> <p>20 authenticity.</p> <p>21 Q. Why do you have your doubts about its</p> <p>22 authenticity?</p> <p>23 A. I told you before. I don't know if this</p> <p>24 was paid for, if this was an actress. I don't know</p>
Page 78	Page 80
<p>---</p> <p>1 MR. CAVALIER: Object to form, foundation.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. Don't you owe -- strike that. Don't you</p> <p>4 have a responsibility, an ethical responsibility, to</p> <p>5 the employees who work with Gregg Roman?</p> <p>6 MR. CAVALIER: Same objection.</p> <p>7 THE WITNESS: [Inaudible].</p> <p>8 BY MR. CARSON:</p> <p>9 Q. I'm sorry?</p> <p>10 A. To do what?</p> <p>11 Q. To protect them.</p> <p>12 MR. CAVALIER: Same objection. Form.</p> <p>13 THE WITNESS: [Inaudible].</p> <p>14 BY MR. CARSON:</p> <p>15 Q. I'm sorry?</p> <p>16 A. Protect whom from who?</p> <p>17 Q. I'll try to make my point. Is there</p> <p>18 anyone else who could fire Gregg Roman other than</p> <p>19 you?</p> <p>20 A. No.</p> <p>21 Q. Is there anyone else who could discipline</p> <p>22 Gregg Roman other than you?</p> <p>23 A. No.</p> <p>24 Q. So is there anyone else who's in a</p>	<p>---</p> <p>1 if it was done legally in a place where one or both</p> <p>2 of the speakers have to get an agreement. I don't</p> <p>3 know any of these things.</p> <p>4 Q. What would it take to find out, though?</p> <p>5 You just pick up the phone and call Alana Goodman,</p> <p>6 correct?</p> <p>7 A. I don't know if this was Alana Goodman.</p> <p>8 Q. Well, you heard her say that she referred</p> <p>9 to herself as Alana in the recording. Like she</p> <p>10 said, Alana, tell him what you should have -- tell</p> <p>11 him why you should have the story. You heard her</p> <p>12 say that, right? So we heard her first name.</p> <p>13 A. What are you asking me?</p> <p>14 Q. I'm asking you that to authenticate its --</p> <p>15 the veracity of the recording. It's just a simple</p> <p>16 phone call from you to Alana Goodman, right?</p> <p>17 MR. CAVALIER: Object to form, foundation.</p> <p>18 You can answer.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. It's all right. You can --</p> <p>21 A. I don't know if that's the case or not. I</p> <p>22 don't know if she would talk to me. I don't know if</p> <p>23 she would authenticate it. I don't know.</p> <p>24 Q. And the reason you don't know is because</p>

Page 81	Page 83
<p>1 you never tried?</p> <p>2 MR. CAVALIER: Object, foundation. He</p> <p>3 never heard the recording before today.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. You never tried calling Alana Goodman; is</p> <p>6 that correct?</p> <p>7 A. [Inaudible].</p> <p>8 THE COURT REPORTER: I can't hear you, Mr.</p> <p>9 Pipes.</p> <p>10 THE WITNESS: I have not called Alana</p> <p>11 Goodman.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. Also, you're being recorded. This is a</p> <p>14 video dep, and I don't know if it's the green screen</p> <p>15 effect you have going on, but it's -- we're not</p> <p>16 getting a -- we're not getting a good video because</p> <p>17 of it, so we gotta [inaudible]. If you wanna use</p> <p>18 the green screen, I think you gotta sit more so on</p> <p>19 the chair. Have you ever read the charge of</p> <p>20 discrimination that Lisa Barbounis filed in this</p> <p>21 case?</p> <p>22 A. Yes.</p> <p>23 Q. Have you ever read the complaint Lisa</p> <p>24 Barbounis filed in this case?</p>	<p>1 you concocted, yes.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. What do you mean by "concocted"?</p> <p>4 A. Imagined, made up.</p> <p>5 Q. You think I used magic to make the</p> <p>6 complaint?</p> <p>7 A. No. You used your imagination.</p> <p>8 Q. Excuse me? We can't hear you.</p> <p>9 A. You used your imagination.</p> <p>10 Q. You think that I used my imagination to</p> <p>11 draft a complaint? That's your testimony?</p> <p>12 A. I do.</p> <p>13 Q. Why?</p> <p>14 A. You put things in that are clearly false.</p> <p>15 Q. Like what?</p> <p>16 A. Like saying that I was the one who asked</p> <p>17 Gregg to come back. It was my initiative -- my</p> <p>18 initiative -- to have Gregg come back in March 2019,</p> <p>19 omitting Lisa Barbounis' initiation on that. She</p> <p>20 simply disappeared.</p> <p>21 Q. Mr. Pipes, did --</p> <p>22 MR. CAVALIER: He's not done his answer.</p> <p>23 BY MR. CARSON:</p> <p>24 Q. Were you done? You can keep going if you</p>
Page 82	Page 84
<p>1 A. Yes.</p> <p>2 Q. So you do know about the allegations that</p> <p>3 Alana Goodman made, correct?</p> <p>4 MR. CAVALIER: Object to form, foundation.</p> <p>5 MR. CARSON: Well, they are listed --</p> <p>6 MR. CAVALIER: That's a</p> <p>7 mischaracterization of the documents you just</p> <p>8 asked him about.</p> <p>9 MR. CARSON: Well, the allegations are in</p> <p>10 those documents, correct?</p> <p>11 MR. CAVALIER: Well, they're allegations</p> <p>12 by Lisa Barbounis --</p> <p>13 MR. CARSON: Jon, why are you answering</p> <p>14 for him?</p> <p>15 MR. CAVALIER: I'm making an objection --</p> <p>16 ---</p> <p>17 (Indistinguishable cross-talk.)</p> <p>18 ---</p> <p>19 MR. CARSON: You're answering the</p> <p>20 question.</p> <p>21 THE COURT REPORTER: Guys, we gotta do one</p> <p>22 at a time.</p> <p>23 MR. CARSON: Don't answer questions.</p> <p>24 THE WITNESS: I read the complaint that</p>	<p>1 want.</p> <p>2 A. I'm done.</p> <p>3 Q. Yeah, I thought you were done.</p> <p>4 MR. CARSON: Please don't interrupt us</p> <p>5 again, Jon, all right? You can put objections</p> <p>6 on the record. That's what you're allowed to</p> <p>7 do in --</p> <p>8 MR. CAVALIER: You keep interrupting the</p> <p>9 witness. I'm gonna keep letting him finish his</p> <p>10 answer.</p> <p>11 MR. CARSON: He just corrected you, Jon.</p> <p>12 He just said he wasn't interrupted.</p> <p>13 MR. CAVALIER: One time out of 60.</p> <p>14 MR. CARSON: Well, you know, if you're</p> <p>15 gonna interrupt, you gotta get it right all the</p> <p>16 time.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. All right. So, Mr. Pipes, was Lisa in a</p> <p>19 position to make a decision to have Gregg Roman</p> <p>20 return to the Middle East Forum?</p> <p>21 A. I said "initiate". You had in that</p> <p>22 complaint that I initiated -- that I, on my own,</p> <p>23 with no role taken by Lisa Barbounis -- I had the</p> <p>24 idea, implying -- and this is a very crucial point</p>

Page 85	Page 87
<p>---</p> <p>1 to these lawsuits -- that I inflicted Gregg on Lisa  2 and the others when, in fact, it was her idea. She  3 came to me. I held a meeting with all the staff,  4 with the administrative staff, and Lisa took the  5 lead and said we want Gregg back. I said good.  6 Good idea. And everyone but Marnie was enthusiastic  7 about it. Marnie didn't like it -- fair enough --  8 but it was Lisa who did it, and your concocted  9 complaint simply makes her disappear from that. It  10 has to be my decision. When I saw that, I realized  11 that this is a bogus case. I realized this is a  12 case where you brought together five women to bring  13 a lawsuit against the Middle East Forum for almost  14 \$31 million, and I realized that you are the one  15 behind it. Fine, okay. That's your work, but it's  16 a concoction. It's a fantasy. It's --</p> <p>17 Q. Do you have any other reasons why you  18 think it's a concoction besides that?</p> <p>19 A. Oh, there are plenty more.</p> <p>20 Q. Well, go ahead. Tell us all the reasons  21 why you think this case is a concoction.</p> <p>22 A. Because that was the first one that  23 signaled to me that this is a falsehood.</p> <p>24 Q. Well, what's the second one?</p>	<p>---</p> <p>1 THE COURT REPORTER: Sir, I cannot hear  2 you.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. Can't hear what you're saying.</p> <p>5 A. If you want all my objections, we have to  6 pull out this document and go through it paragraph  7 by paragraph, which is something I don't think you  8 want to do. So let me say that this was the initial  9 trigger that told me that this is a false document,  10 and it talked about something about me, not about  11 Gregg or anyone else. It was about me, and it was  12 false, false to the core, on a critical, critical  13 [inaudible]. Therefore, I see this as a bogus  14 undertaking that you've initiated.</p> <p>15 Q. Are you finished?</p> <p>16 A. I'm finished.</p> <p>17 Q. Okay. Please, if you can remember, and --  18 listen. We can look at the complaint sometime  19 today. But, right now, as you stand here today, I'm  20 asking if you can think of any other reasons why you  21 think this is a concocted complaint besides the one  22 you already testified to.</p> <p>23 A. I can.</p> <p>24 MR. CAVALIER: Object to form. Dan, you</p>
Page 86	Page 88
<p>---</p> <p>1 A. That's -- I'll stick with that.</p> <p>2 Q. Well, Mr. Pipes, this is your deposition,  3 so if you think that the complaint presents facts  4 that you don't agree with, I'd like you to say all  5 the reasons why you think that the complaint is  6 concocted.</p> <p>7 MR. CAVALIER: Hold on a second. Hold on,  8 Daniel. Hold on. I'm gonna object to the  9 form, and I'm gonna object to foundation.  10 Unless you revise the question, I'm gonna  11 instruct him not to answer. You're asking him  12 to identify all the issues in a 500-paragraph  13 complaint?</p> <p>14 BY MR. CARSON:</p> <p>15 Q. I'm asking you to tell me all the reasons  16 why you think the complaint is concocted. So far,  17 you've given me one. You said because the complaint  18 states that it was your decision to bring Ms. Bar --  19 to bring Gregg Roman back.</p> <p>20 A. Not that I -- my decision it was, yes, but  21 that I originally -- you whitewashed her out of the  22 story is the reason. All my doing when, in fact, it  23 was her initiative. That's all my -- all my  24 problems [inaudible] --</p>	<p>---</p> <p>1 can answer if you can.</p> <p>2 THE WITNESS: I can, yes.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. You can?</p> <p>5 A. I can.</p> <p>6 Q. Okay. So, please, what's -- give us  7 another reason.</p> <p>8 A. I believe that one suffices because that's  9 what told me that this is a bogus undertaking,  10 that --</p> <p>11 Q. I'm gonna give you the opportunity -- I'm  12 sorry. Are you finished?</p> <p>13 A. I'm finished.</p> <p>14 Q. I'm gonna give you the opportunity because  15 if you think this is a concocted complaint, I want  16 you to be able to tell -- say on the record why. So  17 I'll give you the opportunity. Can you think of any  18 other reasons right now, other than the reason that  19 you provided us, why this is a concocted complaint?</p> <p>20 A. Yes.</p> <p>21 Q. So what is it?</p> <p>22 A. I would rather stick with just this one,  23 and if we wanna go through the document, we can go  24 through it, and I'll give you all my complaints.</p>

Page 89	Page 91
<p>--- 1 There are many, but I do not remember them all. 2 Q. You can't remember any other ones right 3 now, right? 4 A. I remember this one specifically as the 5 most important, as the one that most directly 6 involved me. 7 Q. So let's talk about that one since it's 8 the only one that you're able to testify about right 9 now. Did Lisa Barbounis have the authority to bring 10 Gregg Roman back to the Middle East Forum after he 11 was ejected in November of 2018? 12 MR. CAVALIER: I'm gonna object to the 13 form. 14 BY MR. CARSON: 15 Q. I can set it up. Was Gregg Roman ejected 16 from the Middle East Forum in November of 2018? And 17 by "ejected," I mean physically not allowed to show 18 up at the office anymore. 19 MR. CAVALIER: Same objection. 20 THE WITNESS: Yes. 21 BY MR. CARSON: 22 Q. So after -- were there other conditions of 23 Gregg Roman's continued employment with the Middle 24 East Forum in November 2018 other than not being</p>	<p>--- 1 which we did, and I had the conclusion that 2 with everyone's assent, happiness -- with 3 exception of Marnie Meyer -- he resumed some of 4 his duties that were ended in November, five 5 months earlier. 6 THE COURT REPORTER: Seth, are you 7 talking? I'm going off the stenographic 8 record. I can't hear you at all. 9 --- 10 (Discussion was held off the record.) 11 --- 12 BY MR. CARSON: 13 Q. The question that I asked that I don't 14 think anyone heard is, isn't it true that the 15 decision for some of those restrictions to be 16 lifted, that was ultimately your decision, right? 17 A. Yes. 18 Q. And so the problem you have with the 19 complaint is that you don't think it adequately 20 explained that you made that decision at the 21 suggestion of Lisa Barbounis; is that correct? 22 MR. CAVALIER: Object to form. You can 23 answer. 24 THE WITNESS: I didn't -- I didn't use the</p>
Page 90	Page 92
<p>--- 1 able to visit the office anymore? 2 A. Yes. 3 Q. At some point in time, you lifted those 4 restrictions, correct? 5 A. Some of them. 6 Q. And it's your testimony that you lifted 7 those restrictions at the suggestion of Lisa 8 Barbounis, correct? 9 MR. CAVALIER: Object to form. 10 BY MR. CARSON: 11 Q. Is that your testimony? 12 A. Yes. 13 Q. Use whatever word you want -- suggested, 14 initiated. 15 A. She initiated it. She came to my office 16 and said, I think we need Gregg back. 17 Q. Okay. So -- 18 A. [Inaudible]. 19 THE COURT REPORTER: Sir, I can't hear 20 you. 21 THE WITNESS: I said, oh, that's a 22 surprise. Let's pursue this. Let's have a 23 meeting of all the administrative staff 24 tomorrow and pursue this and discuss this,</p>	<p>--- 1 word -- I wouldn't use the word "adequate". It 2 hid, it disguised, it made disappear the 3 critical fact that Lisa Barbounis, with the 4 enthusiastic support of Tricia McNulty, wanted 5 Gregg back in the office. The narrative is 6 entirely different if they came to me in 7 November and I excluded him, and then I 8 unilaterally brought him back in -- partially 9 brought him back in March, to their dismay, as 10 your complaint suggests. That's one version, 11 and the other is that they, particularly Lisa 12 Barbounis, initiated this, and Tricia McNulty 13 enthusiastically agreed to it. It's a very 14 different story. You distorted the history of 15 what happened, and when I saw that, I realized 16 that this is a falsehood, that this is a tissue 17 of lies. 18 BY MR. CARSON: 19 Q. Based on that, you decided that none of 20 these women were ever subjected to any inappropriate 21 conduct? 22 A. I didn't -- I didn't reach that 23 conclusion. I reached the conclusion that this is 24 an untrustworthy document and that their testimony</p>



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1 and your writing it up were dishonest.

2 Q. When Mr. Roman was brought back to the  
3 Middle East Forum, did any of the women still  
4 require or ask that certain conditions be -- remain  
5 in place to -- for the -- period -- that certain  
6 conditions remain in place?

7 MR. CAVALIER: Object to form.

8 THE WITNESS: I don't remember that any  
9 did. I do remember that I did keep certain  
10 conditions in place. The basic problem, as I  
11 understood it, is that Gregg had become too  
12 close to his staff. I have been the head of an  
13 organization now for 34 years, and I have  
14 always kept my distance. It did not seem to me  
15 a good idea to become friends and to have close  
16 relations with my staff, so I have kept away.  
17 He did not do that. He became friends with  
18 them, and that led to all sorts of  
19 complications, and all that I did in November  
20 of 2018 was say, no more friendship -- not that  
21 [inaudible] -- but end this. No more  
22 fraternizing. You are not to do this. And he  
23 didn't do it. And, indeed, the point of the  
24 March meeting was that everyone said they had

1 and, indeed, the only report I heard about that was  
2 from Marnie Meyer in a memo, handwritten memo, she  
3 wrote to me on the 1st of November, in which she  
4 said that she thought there was something weird that  
5 happened in Israel and that she asked Lisa,  
6 point-blank, "Did Gregg hit on you" -- quote,  
7 unquote -- and Lisa -- Marnie reports, quote, "Lisa  
8 said no," unquoted. So the very first report I had,  
9 I've ever heard, of anything going on denied that  
10 this was, in fact, a sexual encounter of some sort  
11 in Israel. Then I dealt with it. I dealt with it  
12 quickly and thoroughly, and there were no more  
13 complaints until you, Mr. Carson, turned up and came  
14 up with five [inaudible] to demand \$31 million from  
15 the Middle East Forum. We were doing just --

16 Q. Wait, wait. I don't -- can you hear that,  
17 because I can't hear him. I heard you say "until  
18 you, Mr. Carson," and then he broke up.

19 A. You found five plaintiffs and demanded  
20 \$31 million -- 30,800,000-some dollars -- and we  
21 have these lawsuits. But it is clear to me that  
22 these are concocted accusations. Lisa is quoted in  
23 November 2018 saying to Marnie -- no -- she is --  
24 Marnie quotes her in November saying, back in March

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1 no complaints about him since November, no  
2 complaints. Let me make that point. Before  
3 November 1st, 2018, I never heard any  
4 complaints about him, and we had five, six days  
5 of intense discussion, and I said he's on  
6 probation, and if I hear any complaints and if  
7 I -- I will look at them very closely, and if I  
8 find that he has done -- he has trespassed,  
9 he's out. I heard nothing, and after March --

10 BY MR. CARSON:

11 Q. Can you just say the time that you're  
12 talking about? You heard nothing from when till  
13 when?

14 A. I heard nothing before November 1st. I  
15 heard nothing after November, say, 5th or 6th. I  
16 heard nothing after March -- before March 9th, after  
17 March 9th. All the complaints came in the early  
18 part of November 2018. There were otherwise no  
19 complaints against him so -- also, it's worth noting  
20 that, in 2018, I was hearing complaints, in  
21 particular from Lisa Barbounis, about the trip to  
22 Israel that happened, I think, in March or April of  
23 that year, seven or eight months earlier. I had not  
24 heard about it at the time. She did not come to me,

1 or April, Lisa said no, there was no problem. So I  
2 am very skeptical about this entire thing. Let me  
3 go further and say that Marnie reported to me back  
4 in November 2018, Lisa said that -- Lisa said that  
5 Gregg had touched her with his foot on her backside.  
6 Marnie said that Gregg -- she couldn't remember, but  
7 Gregg -- her conversation with Gregg ended with her  
8 saying to Gregg, "Gregg, I'm not going to sleep with  
9 you". Tricia reported to me that Gregg was too  
10 close to her on a couch in a room full of people.  
11 So, yeah, Lisa's is a problem, except that I had it  
12 already from Marnie that she had denied that back  
13 when it happened. Marnie's was clearly not an  
14 issue. It was, "I said to him I wasn't gonna sleep  
15 with him". It's hardly a major topic. And Tricia  
16 said that he was too close to her on a crowded  
17 couch. Laterally, she said that he tried to touch  
18 her bottom. She didn't tell me that. She changed  
19 her story afterwards. So with all this evidence  
20 coming from the plaintiffs themselves, I'm very  
21 skeptical of this, and I -- and then you brought in  
22 two others, Delaney Yonchek and Caitriona Brady,  
23 both of whom had no complaints whatsoever through  
24 this entire process until you convinced them that,

Page 97	Page 99
<p>---</p> <p>1 oh, Gregg sexually assaulted them. That's what you 2 put in the complaint, and then they denied it in 3 their depositions. So this is all manufactured. 4 Mr. Carson, you're good at your work. You can turn 5 nothing into something. You can turn no problems 6 into a giant problem that convulses the lives of 7 both the plaintiffs and the defendants. 8 Congratulations on your excellent work. 9 Q. Are you sure that Caitriona Brady and 10 Delaney Yonchek claimed that they were sexually 11 assaulted in their complaints? 12 A. It's in there. Yeah. 13 Q. I'll represent to you it's not in there. 14 They never made those claims to me, and they never 15 made those claims in their complaints or their 16 charges. 17 A. We can check, but you have -- 18 Q. When you said -- I'm sorry. Go ahead. 19 A. We can check it. Maybe I have the wording 20 wrong. 21 Q. When you say \$31,000 -- I'm sorry -- when 22 you say \$31 million, I think you might be referring 23 to something called a 26(f) report. Do you know 24 what that is?</p>	<p>---</p> <p>1 million dollars at some point? Not admitted -- I'm 2 sorry -- strike that. So they represented that 3 they'd be willing to settle for a number under a 4 million dollars for all of them; did you know that? 5 A. Later, they did come down, yes, but the 6 initial figure was enormous, and given the two facts 7 that this would break all of us financially and was 8 based on a tissue of lies, I decided to [inaudible]. 9 THE COURT REPORTER: You decided what? 10 THE WITNESS: To fight it, and that's what 11 we are doing. 12 BY MR. CARSON: 13 Q. Well, do you know that when the offer to 14 resolve these cases, all of them, for somewhere 15 south of a million dollars, that was before any of 16 the complaints were filed in the court? 17 A. I do not. 18 Q. You didn't know that, okay. So at some 19 point in time you reached out to Lisa Barbounis and 20 asked her to meet you at 30th Street Station; is 21 that correct? 22 A. Yes. 23 Q. And when you were there, you told Lisa 24 Barbounis that you two have the same problem. Do</p>
Page 98	Page 100
<p>---</p> <p>1 A. I do not. 2 Q. So I don't want you to tell me anything 3 your attorneys told you, but have you ever seen a 4 document from the plaintiff where they -- where 5 anyone -- where anyone asks for \$31 million? 6 A. I saw additions of nine, nine, nine, 7 three-something -- millions, these all are -- and 8 some other amount, and it came out to 30 million, 9 eight-hundred-some thousand -- 33,000. 10 Q. There's a document that a plaintiff has to 11 fill out and a defendant has to fill out in a case 12 called a 26(f) report, which is a -- it's -- it's in 13 the Federal Rules of Civil Procedure under like 14 self-reporting disclosures. Do you know anything 15 about that? 16 A. I do not. I was given this figure from 17 legal source, and I'm just using it. I have the 18 numbers that add up to 31, but I don't -- I don't 19 know the details. 20 Q. So did you know that all the plaintiffs, 21 all together, represented that they would be willing 22 to resolve these matters for a number between a 23 hundred thousand and a million? So they admitted 24 that, all together, the cases aren't even worth a</p>	<p>---</p> <p>1 you remember that? 2 A. What are you referring to? 3 Q. You said to Lisa that you and Lisa have 4 the same problem. Do you remember that? 5 MR. CAVALIER: Form. 6 THE WITNESS: No. 7 BY MR. CARSON: 8 Q. I was just wondering if, by that 9 "problem," you were referring to me since you just 10 testified that I'm the reason why these cases are -- 11 were brought. 12 A. Yeah. Now that you explain, yes, I do 13 believe you are a mutual problem. Yes. 14 Q. Okay. That's a new one. 15 A. You have [inaudible] -- 16 --- 17 (Indistinguishable cross-talk.) 18 --- 19 THE WITNESS: You have made our lives 20 difficult. 21 BY MR. CARSON: 22 Q. Okay. 23 A. She told me, said, "My life is a wreck. 24 My future is in question". She didn't name you, but</p>

Page 101	Page 103
<p>1 the implication was very clear. Had these --</p> <p>2 ---</p> <p>3 (Indistinguishable cross-talk.)</p> <p>4 ---</p> <p>5 BY MR. CARSON:</p> <p>6 Q. -- conversation with you about it, but</p> <p>7 we're not permitted to do that. Can we take a</p> <p>8 five-minute bathroom break, just a little -- I'm</p> <p>9 sorry. Finish. Go ahead.</p> <p>10 A. She said to me that her life is disrupted</p> <p>11 and her future is in question because of these</p> <p>12 lawsuits, and I ascribe these lawsuits to you.</p> <p>13 Q. Okay. I think that -- isn't another way</p> <p>14 to look at it is that it's because of the -- you</p> <p>15 know, the unlawful conduct that they were subjected</p> <p>16 to that caused them to bring the lawsuits?</p> <p>17 MR. CAVALIER: Is that a question?</p> <p>18 MR. CARSON: Yeah. You don't have to</p> <p>19 answer that. Do you guys mind if we do like a</p> <p>20 five-minute bathroom break?</p> <p>21 MR. CAVALIER: I'd rather do ten.</p> <p>22 MR. CARSON: That's fine, Jon.</p> <p>23 MR. CAVALIER: All right, great. Thanks,</p> <p>24 Seth. So 12:10, back on?</p>	<p>1 ---</p> <p>2 MR. CAVALIER: Object to form. You can</p> <p>3 answer.</p> <p>4 THE WITNESS: I believe it was</p> <p>5 November 1st. After receiving the memo from</p> <p>6 Marnie, I asked everyone to be in the office,</p> <p>7 and I interviewed everyone one-on-one.</p> <p>8 BY MR. CARSON:</p> <p>9 Q. So do you remember when you received that</p> <p>10 memo from Marnie?</p> <p>11 A. November 1st, 2018. Morning.</p> <p>12 Q. And how did you receive that memo?</p> <p>13 A. Email.</p> <p>14 Q. And by the memo, I think you're referring</p> <p>15 to -- like it was a few pages, a handwritten</p> <p>16 statement by Marnie Meyer?</p> <p>17 A. That's right.</p> <p>18 Q. And, based on that email, you interviewed</p> <p>19 who?</p> <p>20 A. Everyone in the office.</p> <p>21 Q. So that -- that would include --</p> <p>22 interviewed -- you interviewed Marnie Meyer?</p> <p>23 A. Yes.</p> <p>24 Q. And did you interview Patricia McNulty?</p> <p>25 A. Yes.</p>
Page 102	Page 104
<p>1 ---</p> <p>2 MR. CARSON: Okay. Thank you, guys. I</p> <p>3 just -- I have a little emergency I gotta go</p> <p>4 take care of.</p> <p>5 THE VIDEOGRAPHER: We are now off the</p> <p>6 record.</p> <p>7 ---</p> <p>8 (Whereupon there was a recess in the</p> <p>9 proceeding from 11:58 a.m. to 12:15 p.m.)</p> <p>10 ---</p> <p>11 THE VIDEOGRAPHER: The time is 12:15</p> <p>12 Eastern Time, and we are now on the record.</p> <p>13 THE COURT REPORTER: Seth, you're muted,</p> <p>14 by the way.</p> <p>15 BY MR. CARSON:</p> <p>16 Q. Okay. So let's try to get back to some of</p> <p>17 that testimony that we just went over. So you spoke</p> <p>18 about hearing everything in or around the beginning</p> <p>19 of November 2018. Do you remember that? And by</p> <p>20 "everything," I mean the allegations that are the</p> <p>21 subject matter in this case.</p> <p>22 A. Yes.</p> <p>23 Q. And can you pin down exactly what the date</p> <p>24 is when you first heard the allegations of Lisa</p> <p>25 Barbounis?</p>	<p>1 ---</p> <p>2 Q. And Lisa Barbounis?</p> <p>3 A. Yes.</p> <p>4 Q. Did you interview Matthew Bennett?</p> <p>5 A. Yes.</p> <p>6 Q. And did you interview Caitriona Brady?</p> <p>7 A. Yes.</p> <p>8 Q. Delaney Yonchek?</p> <p>9 A. Yes.</p> <p>10 Q. Did you interview Thelma Prosser?</p> <p>11 A. Yes.</p> <p>12 Q. And did you -- can you think of anyone</p> <p>13 else that you interviewed?</p> <p>14 A. Gregg, Stacey [phonetic].</p> <p>15 Q. Anybody else?</p> <p>16 A. Gary, maybe. I'm not sure. Gary Gambill.</p> <p>17 Q. Gary?</p> <p>18 A. Gambill.</p> <p>19 Q. Gambill.</p> <p>20 A. Maybe.</p> <p>21 Q. So that's ten people. Other than those</p> <p>22 ten people, is there anyone else that you can think</p> <p>23 of that you interviewed? It's okay -- if you leave</p> <p>24 someone out, it's not the end of the world.</p> <p>25 A. No.</p>



Page 105	Page 107
<p>---</p> <p>1 Q. The interview with -- who did you</p> <p>2 interview first; do you remember?</p> <p>3 A. No.</p> <p>4 Q. Do you remember -- these interviews, did</p> <p>5 they take place over the phone, in person?</p> <p>6 A. In person, one-on-one in their offices.</p> <p>7 Q. You visited each of their offices?</p> <p>8 A. I did.</p> <p>9 Q. And tell me, please, what Lisa Barbounis</p> <p>10 reported.</p> <p>11 MR. CAVALIER: Object to form. You can</p> <p>12 answer.</p> <p>13 BY MR. CARSON:</p> <p>14 Q. What did she say?</p> <p>15 A. She gave me a exposition of her complaints</p> <p>16 about Gregg as a manager, as her supervisor.</p> <p>17 Q. And what precisely did she say about Gregg</p> <p>18 as a supervisor?</p> <p>19 A. Too demanding, too inquisitive, watching</p> <p>20 everybody, manipulative.</p> <p>21 Q. I didn't hear the last one.</p> <p>22 A. Manipulative.</p> <p>23 Q. Anything else?</p> <p>24 A. I can't remember exactly if it was she,</p>	<p>---</p> <p>1 Q. Did she describe any other sexually</p> <p>2 inappropriate conduct?</p> <p>3 A. No.</p> <p>4 MR. CAVALIER: I'm gonna object to form on</p> <p>5 the last question.</p> <p>6 BY MR. CARSON:</p> <p>7 Q. Did she say that Gregg Roman brushed</p> <p>8 against her in the office?</p> <p>9 A. No.</p> <p>10 Q. Did she say that Gregg Roman showed her</p> <p>11 inappropriate photos?</p> <p>12 A. No.</p> <p>13 Q. Did she say whether Gregg Roman forced her</p> <p>14 to sit inappropriately close to him, other than the</p> <p>15 couch incident?</p> <p>16 A. She did complain that he wanted her by his</p> <p>17 side. I don't know if it was inappropriate, but she</p> <p>18 was being called into his office -- the witness is</p> <p>19 doing something to be there -- and she thought it</p> <p>20 was a waste of time. She didn't like it. She</p> <p>21 thought he was wasting her time.</p> <p>22 Q. Regarding the other complaints regarding</p> <p>23 Gregg Roman being manipulative or -- did you ever</p> <p>24 hear complaints about Gregg Roman like that before?</p>
Page 106	Page 108
<p>---</p> <p>1 but make-work that wasn't serious. Range of issues.</p> <p>2 Q. Did she talk about any inappropriate</p> <p>3 conduct in terms of, you know, sexual harassment?</p> <p>4 A. Yes.</p> <p>5 Q. What did she say about that?</p> <p>6 A. She told me about the trip to Israel, and</p> <p>7 she showed me her screenshots of her text to her</p> <p>8 husband, and I don't know who else, and she</p> <p>9 [inaudible].</p> <p>10 THE COURT REPORTER: I didn't hear that</p> <p>11 last part.</p> <p>12 THE WITNESS: She told me what happened</p> <p>13 there.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. What did she say happened?</p> <p>16 A. She said that they had a Airbnb together</p> <p>17 and that, late one evening, he had stretched out on</p> <p>18 the couch and said something to the effect of, now</p> <p>19 we are close, and now I can put my feet on your --</p> <p>20 against your body.</p> <p>21 Q. Did she say where on her body that he</p> <p>22 put -- where he put his feet?</p> <p>23 A. On her back and on her -- on her bottom</p> <p>24 and back.</p>	<p>---</p> <p>1 A. Before November 1st, I heard no complaints</p> <p>2 at all about Gregg from anyone.</p> <p>3 Q. How about from Tiffany Lee?</p> <p>4 A. [Inaudible].</p> <p>5 THE COURT REPORTER: I can't hear you,</p> <p>6 sir.</p> <p>7 THE WITNESS: From anyone. She complained</p> <p>8 after she left. Active employees, I never</p> <p>9 heard from anyone.</p> <p>10 BY MR. CARSON:</p> <p>11 Q. Why do you make a distinction between</p> <p>12 reports of active employees verse current employees?</p> <p>13 MR. CAVALIER: Object to form.</p> <p>14 THE WITNESS: After Tiffany Lee was</p> <p>15 terminated, she then went to Derek Smith Law</p> <p>16 Group and found a lawyer who would concoct --</p> <p>17 Caroline Miller's the name, I believe -- who</p> <p>18 would concoct a claim against the Forum based</p> <p>19 on inaccurate use of text. We exposed them,</p> <p>20 and Tiffany Lee disappeared, but she had no</p> <p>21 complaints whatsoever while she was an active</p> <p>22 employee.</p> <p>23 BY MR. CARSON:</p> <p>24 Q. I didn't hear the last part of that.</p>

Page 109	Page 111
<p>---</p> <p>1 A. She had no complaints about anybody, about 2 Gregg, while she was an active employee. 3 Q. Did you consider that -- did you consider 4 Tiffany Lee's charge of discrimination in any way 5 when you heard about these allegations from Patricia 6 McNulty and Lisa Barbounis and Marnie Meyer? 7 A. No. I thought about the Derek Smith Law 8 Firm -- Law Group -- 9 Q. Why is that? 10 A. -- to those two cases and a third case 11 also concocted complaints against us. I don't know 12 what it is about Derek Smith Law Group, why you have 13 it in for the Middle East Forum, but anybody who's 14 unhappy about anything or has any aspirations to 15 anything turns to the Derek Smith Law Group -- 16 Caroline Miller, Ken Lobitz [phonetic], Seth Carson, 17 Erica Shikunov. Everybody wants to get at us with 18 the Derek Smith Law Firm. You tell me why. 19 Q. If -- well, I didn't work here when 20 Tiffany Lee filed a charge, so I don't have any 21 knowledge related to that, but I guess my question 22 is, other than Tiffany Lee and the plaintiffs in 23 this case, is there another allegation or charge 24 that was filed against the Middle East Forum?</p>	<p>---</p> <p>1 so [inaudible]. 2 Q. Why -- what was Lara's position? 3 A. Lara was assistant to Gregg. 4 Q. An assistant to who? 5 A. Gregg. 6 Q. And what's Lara's last name? 7 A. I don't remember. 8 Q. What about Laura? Laura's last name is 9 Frank? 10 A. Could be, yeah. 11 Q. Laura Frank, what was her job? 12 A. Director of development, I believe. 13 Q. Did Lara and Laura talk to each other 14 during work using any electronic messaging apps that 15 you know of? 16 MR. CAVALIER: Object to form. 17 THE COURT REPORTER: I didn't get the 18 answer. 19 THE WITNESS: That's all they did is 20 message each other on Slack, which we have. 21 Endless, endless discussions hating Gregg, 22 hating me. Nasty, snarky, endless, endless, 23 endless. 24 BY MR. CARSON:</p>
Page 110	Page 112
<p>---</p> <p>1 A. Not filed, but I believe a letter was sent 2 from Smith Law Group about Lara [phonetic] and 3 Laura, who were also terminated because they were 4 poor employees. When they started talking about the 5 case against us, we showed them what we knew about 6 them, and they dropped it. But that's four 7 different instances of turning to lawyers who 8 presently or had been at the Derek Smith Law Group. 9 Q. What were the -- what were the complaints 10 that Lara and Laura made? 11 A. You're interrupting me. I guess the Derek 12 Smith Law Group doesn't like what we do. 13 Q. I don't think anyone here knows what you 14 guys do, but what were the complaints that Lara and 15 Laura made? 16 A. I don't remember. They were minor, and I 17 don't know if I ever saw them. They're not on my 18 hard drive. I don't know what they were. 19 Q. Was it related to sexual harassment? 20 A. I don't know. 21 Q. Just the allegations. I'm not saying -- 22 I'm not giving any credence to them. 23 A. I don't know. Just remember they started 24 making noises, and then they wanted money from us,</p>	<p>---</p> <p>1 Q. And you still have those messages, right? 2 A. I'm not sure. 3 Q. Well, you just said "which we have". 4 A. Which we -- which I read at the time. 5 Presumably, it's somewhere. 6 MR. CARSON: I'm gonna ask that you guys 7 turn those messages over in response to our 8 discovery requests. 9 MR. CAVALIER: If we have them in our 10 possession, custody, or control and there's a 11 responsive request, we will do so. 12 MR. CARSON: I mean, we definitely 13 requested them in our request for production of 14 documents. So there's Slack messages which -- 15 just testifying to having. 16 THE WITNESS: No. I testified that I read 17 them at the time. 18 BY MR. CARSON: 19 Q. A minute ago, you said "which we have," 20 so -- 21 A. I'm correcting it and saying I read it at 22 the time, which is middle of 2017 -- 23 Q. Right. 24 A. -- years ago. I don't know if I have them</p>

Page 113	Page 115
<p>1 now. [Inaudible] --</p> <p>2 MR. CAVALIER: If we have responsive</p> <p>3 documents that are responsive and not</p> <p>4 privileged to the request you issued we will</p> <p>5 produce them.</p> <p>6 MR. CARSON: We'll deal with that.</p> <p>7 BY MR. CARSON:</p> <p>8 Q. So what did these messages say about Gregg</p> <p>9 Roman?</p> <p>10 A. Just they were nasty.</p> <p>11 Q. They were nasty?</p> <p>12 A. Nasty.</p> <p>13 Q. Why were they nasty?</p> <p>14 A. Have to ask them.</p> <p>15 Q. Why did you think they were nasty?</p> <p>16 A. I have no idea. I didn't know them. I</p> <p>17 found their vituperation against him and myself and</p> <p>18 maybe others to be surprising, but there it was.</p> <p>19 Q. How many people other than the -- other</p> <p>20 than Tiffany Lee and Lara and Laura and Delaney and</p> <p>21 Caitriona and Marnie and Patricia McNulty and Lisa</p> <p>22 Barbounis have complained about Gregg Roman?</p> <p>23 A. Nobody.</p> <p>24 Q. No one else?</p>	<p>1 A. -- heard from me on this, both in person.</p> <p>2 At the time, I remember, he was sitting in my</p> <p>3 office, and he said, "Matt, get over here," and I</p> <p>4 said, "You can't treat him like that." Other times,</p> <p>5 there are two written documents -- I mean, there are</p> <p>6 other times I said it in person, but the two</p> <p>7 documents, we have emails from me to Gregg</p> <p>8 lacerating him, being too tough, too bossy. I</p> <p>9 called him a drill sergeant. You don't behave like</p> <p>10 this. You get the best out of people by working</p> <p>11 with them and not bossing them [inaudible]. I was</p> <p>12 the one who complained. Matt never said a word</p> <p>13 [inaudible] --</p> <p>14 THE COURT REPORTER: It's really hard to</p> <p>15 hear you, Mr. Pipes. Please speak up.</p> <p>16 THE WITNESS: -- anyone else. I, on my</p> <p>17 own, complained that he was too bossy. I</p> <p>18 complained to him. He heard it through me.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. So Matt didn't complain; Gregg -- you</p> <p>21 complained?</p> <p>22 A. I complained, and I complained number of</p> <p>23 times, and I kept on complaining. He's a brilliant</p> <p>24 administrator. He knows the subject, but he was too</p>
Page 114	Page 116
<p>1 A. Not to me. Not to my knowledge.</p> <p>2 Q. No one else complained that Gregg Roman</p> <p>3 disparages other employees?</p> <p>4 A. I am president. I am not omniscient</p> <p>5 voyeur of what everyone is doing and saying.</p> <p>6 Q. Well --</p> <p>7 A. -- not to me.</p> <p>8 Q. I'm not suggesting that omniscience is</p> <p>9 required. I'm asking if you ever heard any other</p> <p>10 employee of the Middle East Forum make complaints</p> <p>11 about the way Gregg Roman behaved in his -- in his</p> <p>12 role as director of the Middle East Forum.</p> <p>13 A. Yes. And two years ago Matt complained as</p> <p>14 well, Matt Bennett.</p> <p>15 Q. Matt Bennett made complaints, too?</p> <p>16 A. Yeah.</p> <p>17 Q. What were Matt Bennett's complaints?</p> <p>18 A. Again, Gregg was too tough. He was</p> <p>19 bossing them around. And I might add that the only</p> <p>20 bossiness I saw on Gregg's part was vis-à-vis Matt,</p> <p>21 not the plaintiffs.</p> <p>22 Q. Did anyone else besides Matt Bennett --</p> <p>23 A. Don't interrupt me. And he --</p> <p>24 Q. Okay.</p>	<p>1 tough, too bossy. I didn't like it, didn't think</p> <p>2 it's the way one should treat one's colleagues. So</p> <p>3 that was my complaint. My complaint. Nobody came</p> <p>4 to me. I, on my own, from what I witnessed,</p> <p>5 particularly vis-à-vis Matt, was displeased with his</p> <p>6 bossiness. So I understood when they said he's too</p> <p>7 bossy. I said, yeah, I understand. I saw -- I</p> <p>8 didn't see it with the others, but I saw it with</p> <p>9 Matt.</p> <p>10 Q. You ever seen Gregg take his penis out in</p> <p>11 front of a female employee?</p> <p>12 MR. CAVALIER: Object to form.</p> <p>13 BY MR. CARSON:</p> <p>14 Q. Yes or no?</p> <p>15 A. No.</p> <p>16 Q. You ever seen Gregg rub his body against a</p> <p>17 female employee?</p> <p>18 A. No. I never saw any kind of harassment of</p> <p>19 any sort.</p> <p>20 Q. Did Gregg ever -- strike that. Did you</p> <p>21 ever -- did you know that one of the complaints that</p> <p>22 the women were making is that they weren't allowed</p> <p>23 to come to you directly, that Gregg had a policy</p> <p>24 whereby people weren't allowed to talk to you or</p>

Page 117	Page 119
<p>1 report things to you? Did you know that?</p> <p>2 A. I know it's in the complaint, to which my</p> <p>3 response is, I told every new employee two things:</p> <p>4 The number one rule is no surprises. If something's</p> <p>5 going wrong, come to me early, not when it's a</p> <p>6 full-bloomed crisis. Number two, my door is open,</p> <p>7 both literally and figuratively. Come to me if you</p> <p>8 have any problems. So it is very hard for me to</p> <p>9 believe that they were concerned about coming to me</p> <p>10 with their problems since I had specifically invited</p> <p>11 them to come to me with their problems.</p> <p>12 Q. But they told you that, too, right, that</p> <p>13 they -- that Gregg maintained this policy which</p> <p>14 blocked them from coming to you or which was -- they</p> <p>15 believed blocked them from coming to you?</p> <p>16 A. They did tell me that, yes.</p> <p>17 Q. Does the Middle East Forum maintain a</p> <p>18 policy to prevent discrimination and harassment in</p> <p>19 the workplace?</p> <p>20 A. Yes, and we've held workshops for</p> <p>21 refreshers on those subjects.</p> <p>22 Q. When's the last time you've held one of</p> <p>23 these workshops?</p> <p>24 A. I think it was in 2018.</p>	<p>1 have any problems.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. Are you listed in that -- in that employee</p> <p>4 manual for -- as part of the reporting process?</p> <p>5 A. As the president, not by name, yes. There</p> <p>6 was also a process by which employees unhappy about</p> <p>7 something would turn to the director of human</p> <p>8 resources, being Marnie Meyer, and I believe, in</p> <p>9 some cases, people did do that, but I don't know</p> <p>10 details, but they did do that.</p> <p>11 Q. Other than Matt Bennett, Lisa Barbounis,</p> <p>12 Caitriona Brady, Delaney Yonchek, Laura Frank,</p> <p>13 Lara -- we'll say Lara, last name unknown, since I</p> <p>14 don't know it off the top of my head -- Patricia</p> <p>15 McNulty, did anyone else -- did any other employees</p> <p>16 complain to you about the way Gregg Roman behaved?</p> <p>17 A. No. I -- in November 2018, there was this</p> <p>18 crisis in the office, and I then approached the</p> <p>19 out-of-office staff and asked them if they had</p> <p>20 problems with Gregg. I think I approached all the</p> <p>21 project directors at the time, and all said things</p> <p>22 were fine. One said few things I don't like, but</p> <p>23 nothing particularly deep. So they gave him a clean</p> <p>24 bill of health, so he was an office issue, not a</p>
Page 118	Page 120
<p>1 Q. In 2018?</p> <p>2 A. Yes.</p> <p>3 Q. Was that in response to the reports that</p> <p>4 are the subject matter of this case?</p> <p>5 A. No. It was ahead of it, sometime in the</p> <p>6 early part of the year.</p> <p>7 Q. The policy that Middle East Forum</p> <p>8 maintains to prevent discrimination and harassment</p> <p>9 in the workplace, is that a written policy?</p> <p>10 A. Yes. It's in the personnel manual.</p> <p>11 Q. It's in the personnel manual?</p> <p>12 A. Yes.</p> <p>13 Q. Where does it say that employees should</p> <p>14 complain about discrimination and harassment or</p> <p>15 report discrimination and harassment?</p> <p>16 A. [Inaudible].</p> <p>17 THE COURT REPORTER: I cannot hear you,</p> <p>18 Mr. Pipes.</p> <p>19 THE WITNESS: I don't have the personal</p> <p>20 [inaudible] cite to you paragraph, but I know</p> <p>21 that it's part of my policy, it's fairly</p> <p>22 extensive in there, and I also know that I told</p> <p>23 every employee as the employee started there</p> <p>24 would be no surprises, and come to me if you</p>	<p>1 Forum-wide issue. Outside the office did not</p> <p>2 have --</p> <p>3 Q. They all gave him a clean bill of health?</p> <p>4 A. Yeah. Well, except for one who had a few</p> <p>5 issues, yes.</p> <p>6 Q. What was the one's complaints?</p> <p>7 A. Something on the lines of piling on too</p> <p>8 much -- two different projects. Before one ended,</p> <p>9 the next one started.</p> <p>10 Q. I'm sorry. I didn't hear you.</p> <p>11 A. Something on the lines of, before one</p> <p>12 project was finished, the next one was started.</p> <p>13 Q. Other than that one complaint, was there</p> <p>14 any other complaints?</p> <p>15 A. No.</p> <p>16 Q. The project directors -- strike that.</p> <p>17 Just a moment, please. I'm just finding a document.</p> <p>18 Just a minute, please, while I pull this up. Sorry.</p> <p>19 Just an indulgence for a second. Okay. All right.</p> <p>20 So do you see this document right here, which is --</p> <p>21 wait. I gotta keep a list of exhibits. So Exhibit</p> <p>22 No. 1 was -- Exhibit 1 we'll call Pipes-1, I guess,</p> <p>23 and Pipes-1 was the --</p> <p>24 THE VIDEOGRAPHER: It was the Middle</p>



Page 121	Page 123
<p>1 East --</p> <p>2 ---</p> <p>3 (Indistinguishable cross-talk.)</p> <p>4 ---</p> <p>5 MR. CARSON: Yeah. And so Pipes-2 will be</p> <p>6 MEF Docs, and we'll say 975, 976, 977, and 978.</p> <p>7 So MEF Docs --</p> <p>8 THE VIDEOGRAPHER: And then, Counsel,</p> <p>9 would you like to mark for exhibit the</p> <p>10 screenshot of the website or the recording you</p> <p>11 played?</p> <p>12 MR. CARSON: Oh, yeah. So, yeah, let's</p> <p>13 just -- it'll be out of order, but Pipes --</p> <p>14 Pipes-3 will just be the --</p> <p>15 THE VIDEOGRAPHER: The screenshots, sir?</p> <p>16 MR. CARSON: Pipes-3 will be the</p> <p>17 screenshot of the website.</p> <p>18 THE VIDEOGRAPHER: All right. And Pipes-4</p> <p>19 will be the recording concerning Gregg?</p> <p>20 MR. CARSON: Pipes-4 is the recording.</p> <p>21 THE VIDEOGRAPHER: Okay. And then,</p> <p>22 Counsel, just going forward, would you like me</p> <p>23 to maintain the order of exhibition in the</p> <p>24 labeling?</p>	<p>1 A. It does, yeah.</p> <p>2 Q. -- project director said about Gregg?</p> <p>3 A. Yep.</p> <p>4 Q. They did not give him a clean bill of</p> <p>5 health, correct?</p> <p>6 A. Well, I mean, they all had something to</p> <p>7 say, but I asked the project directors about their</p> <p>8 willingness to work with you. Five out of the six</p> <p>9 were happy to do so. So that's what I mean by clean</p> <p>10 bill of health. Were they happy about everything?</p> <p>11 No, but they were happy to work with him, and that's</p> <p>12 a clean bill of health. One had his doubts.</p> <p>13 Q. One had his doubts?</p> <p>14 A. Wasn't so happy about working with him,</p> <p>15 but --</p> <p>16 Q. Who was the one who didn't wanna work with</p> <p>17 him?</p> <p>18 A. I don't remember.</p> <p>19 Q. Well, who are the project directors? What</p> <p>20 are their names?</p> <p>21 MR. CAVALIER: Object to form.</p> <p>22 THE WITNESS: Back then, I'm not sure. I</p> <p>23 have to check.</p> <p>24 BY MR. CARSON:</p>
Page 122	Page 124
<p>1 MR. CARSON: Sure.</p> <p>2 THE VIDEOGRAPHER: -- do it like that.</p> <p>3 MR. CARSON: All right. Thank you. So</p> <p>4 Pipes-2 is MEF Docs 975 to 978.</p> <p>5 THE VIDEOGRAPHER: Gotcha.</p> <p>6 BY MR. CARSON:</p> <p>7 Q. So, Mr. Pipes, this is an email that, it</p> <p>8 looks like, was sent by you to Gregg Roman on</p> <p>9 November 8, 2018 at 9:02 a.m. Do you see that right</p> <p>10 here?</p> <p>11 A. Mm-hmm.</p> <p>12 Q. Okay.</p> <p>13 A. Yes.</p> <p>14 Q. So just take a minute and you can read it,</p> <p>15 and I'll ask you questions about it when you're</p> <p>16 done.</p> <p>17 A. Okay. Okay. Okay.</p> <p>18 Q. Sorry. You guys are on my screen. I was</p> <p>19 gonna check my email.</p> <p>20 A. Okay.</p> <p>21 Q. So...</p> <p>22 A. Okay. Okay. Okay. Read it.</p> <p>23 Q. Does that give you a better recollection</p> <p>24 of what the --</p>	<p>1 Q. That's what we're talking about here.</p> <p>2 These are the project directors, correct?</p> <p>3 A. Right, but this is over two years ago, and</p> <p>4 I have to go check who was doing what when. And --</p> <p>5 Q. Go ahead. You wanna add something?</p> <p>6 A. No.</p> <p>7 Q. So, just pointing out a couple things, you</p> <p>8 say here that four of them made critical comments,</p> <p>9 right?</p> <p>10 A. Yep.</p> <p>11 Q. And you sent this email to Gregg to make</p> <p>12 him aware of these comments; is that right?</p> <p>13 A. And to select in-office staff, yes.</p> <p>14 Q. So why didn't you -- it says, "I listed</p> <p>15 the harsh criticisms of you from in-office staff but</p> <p>16 have not collected these in a systematic way." Why</p> <p>17 didn't you collect them in a systematic way?</p> <p>18 A. Finish the sentence.</p> <p>19 Q. I see what it says. Says, "Because you</p> <p>20 will not be working with them going forward," but</p> <p>21 why does that matter?</p> <p>22 A. He knew what they had to say. I didn't</p> <p>23 have to memorialize it because they weren't gonna be</p> <p>24 working together.</p>

Page 125	Page 127
<p>---</p> <p>1 Q. So nowhere are your conversations with 2 the -- you know, ten people that we listed earlier 3 that you spoke to in the beginning of November 2018, 4 nowhere are those conversations memorialized the way 5 these conversations are, right?</p> <p>6 MR. CAVALIER: Object to form, foundation. 7 You can answer.</p> <p>8 THE WITNESS: I took notes, but because 9 everything was solved to apparently everyone's 10 satisfaction, I did not -- I'm not sure if I 11 still have those notes. It didn't seem 12 important. We had --</p> <p>13 BY MR. CARSON:</p> <p>14 Q. What did you do --</p> <p>15 A. We dealt with the issue, and maybe I have 16 them somewhere; maybe I don't. I don't know.</p> <p>17 Q. I asked on the record that the notes from 18 those meetings -- search your records, and if you 19 have them, that you turn those over in response to 20 our first set of -- first request for production of 21 documents. Meetings. How did you keep those notes, 22 you handwrote them during the meetings?</p> <p>23 A. Handwrote them during the meetings, yeah.</p> <p>24 Q. Again, please check your records and turn</p>	<p>---</p> <p>1 Q. Well, don't you think it's important to 2 document it, like to keep a record of who's saying 3 what? I understand why you might not have wanted 4 Gregg to read it, but why wouldn't you keep records 5 like that?</p> <p>6 A. Because go to the top, and you'll see that 7 I gave them assurance of confidentiality.</p> <p>8 Q. Sorry?</p> <p>9 A. This information was sent to me on 10 assurances of confidentiality.</p> <p>11 Q. You thought -- you would -- what about 12 with yourself? Wouldn't you want those records for 13 yourself?</p> <p>14 A. I offered confidentiality. I maintain 15 that confidentiality in this note, which went not 16 only to Gregg, but also to select in-office staff. 17 So it went to several people, and I thought it best 18 not to provide specific names, and there is no name 19 in here other than Gregg's.</p> <p>20 Q. So this person is saying something more 21 calculated and toxic --</p> <p>22 A. Yes.</p> <p>23 Q. -- first blank -- sorry. Did you --</p> <p>24 A. Well, this is the accusation that he was</p>
Page 126	Page 128
<p>---</p> <p>1 them over if you can find them. So one person said 2 that he -- "I have often had to listen -- both on 3 the phone and in person -- as Gregg expressed 4 unpleasant views toward other members of staff. He 5 often denounces or spoken ill of other project 6 directors or office staff before pointedly asking me 7 what I thought of them. I could only speak in their 8 defense or offer a noncommittal response. This does 9 not seem to have been ordinary office politics, but 10 something more calculated and toxic. First XX, and 11 then XX" -- what's the XX there and the XX? Why 12 does it say XX?</p> <p>13 A. Names of individuals.</p> <p>14 Q. You didn't want Gregg to know who was 15 making the statements; is that right?</p> <p>16 A. No. The whole thing is anonymous.</p> <p>17 Q. Well, whose names were there before you 18 X'd them out?</p> <p>19 A. I have no idea.</p> <p>20 Q. Well, how do we figure that out?</p> <p>21 A. I don't know.</p> <p>22 Q. Well, do you have any notes anywhere that 23 we could look to?</p> <p>24 A. I don't know.</p>	<p>---</p> <p>1 manipulative, yes. This is what I heard from 2 in-office and heard it from outside of the office, 3 too, yes.</p> <p>4 Q. Well, he names two people that are the 5 most frequent targets of Gregg, right?</p> <p>6 A. He or she does, yes.</p> <p>7 Q. So don't you think it's important what 8 those names are if they're relevant to this case?</p> <p>9 MR. CAVALIER: Object to form, foundation.</p> <p>10 THE WITNESS: I assured them of 11 confidentiality.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. But your word that you'll keep it 14 confidential isn't a reason not to disclose that in 15 this case. You understand that, right?</p> <p>16 A. I don't know. This is two years ago. I 17 have no idea who these people are.</p> <p>18 Q. You just forget?</p> <p>19 A. Yes. I mean, I move on. I deal with the 20 Middle East. I don't spend my time thinking about 21 office -- the office.</p> <p>22 Q. You don't --</p> <p>23 A. I dealt with it -- let me finish -- I 24 dealt with it. I dealt with it satisfactorily.</p>

Page 129	Page 131
<p>---</p> <p>1 Everyone in the office literally signed on who was 2 concerned. All three of the complainants signed on, 3 like written documents saying they're fine with it. 4 They weren't happy about every aspect, but they were 5 fine with it. Gregg was fine with it. We moved on. 6 I did not think about these things after that. I 7 have not thought about them for two years. We 8 solved the problem. I --</p> <p>9 Q. Did any of them complain after they gave 10 you that agreement?</p> <p>11 A. I told you not a single complaint before 12 November 1st or after November 6th, 7th, or so. Not 13 a single one.</p> <p>14 Q. You're sure of that?</p> <p>15 A. Well, I don't remember any. I can't tell 16 you for sure. I might've forgotten something, but I 17 don't remember any complaints, certainly nothing of 18 a sexual nature, nothing that would cause me to fire 19 Gregg, which I said I would do if there was anything 20 of a sexual nature.</p> <p>21 Q. What about retaliation? Would you fire 22 Gregg if he retaliated against the employees who 23 reported him?</p> <p>24 MR. CAVALIER: Object to form.</p>	<p>---</p> <p>1 he has no second chance.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. But they did let you know, and you didn't 4 do anything about it, right?</p> <p>5 MR. CAVALIER: Object to form, foundation.</p> <p>6 THE WITNESS: They did not let me know. 7 They let me know in early November about things 8 that had happened months and months earlier. 9 Prior to November there were no complaints 10 about anything of a sexual nature or anything 11 else, for that matter, that I can recall. I 12 mean, not everybody finds him wonderful in 13 every way, but I do not recall any serious 14 complaints about Gregg before or after that 15 week in the middle of -- at the beginning of 16 November 2018.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. No complaints about retaliation?</p> <p>19 A. No complaints about retaliation.</p> <p>20 Q. No complaints, period, actually?</p> <p>21 A. No complaints, period, yes. That's 22 correct. If there were some and I forgot, then 23 remind me, but I remember nothing. I remember a 24 clean bill, and I remember Tricia, in particular,</p>
Page 130	Page 132
<p>---</p> <p>1 THE WITNESS: He had no opportunity to 2 retaliate.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. We can't -- did you hear that, because I 5 didn't.</p> <p>6 A. There was no opportunity for him to 7 retaliate. He was out of their lives. Between 8 November and March, he had almost no contact with 9 them. Only after March did he do so.</p> <p>10 Q. Well, he was still the director of the 11 Middle East Forum that whole time, right?</p> <p>12 A. He had the same title but very different 13 job responsibilities. I'm sure you have the email I 14 sent to him describing his new responsibilities, and 15 you'll see that he had no -- essentially, 16 effectively, no contact, just some emails once in a 17 while. I took him out of their lives, and they were 18 content.</p> <p>19 Q. They were content unless they were 20 complaining about it the whole time to you, right?</p> <p>21 MR. CAVALIER: Objection.</p> <p>22 THE WITNESS: I specifically said at the 23 meeting and in other context if you have any 24 problems with Gregg, let me know. I told them</p>	<p>---</p> <p>1 saying at the March meeting he's been great. I have 2 no complaints. She said it explicitly. I have no 3 complaints.</p> <p>4 Q. Tricia definitely didn't make any 5 complaints to you?</p> <p>6 A. Definitely.</p> <p>7 Q. In fact, she said the opposite. She said 8 everything's great?</p> <p>9 A. She said I have no problems with Gregg 10 since November, the last five months.</p> <p>11 Q. And if she was complaining to you, you 12 would've fired Gregg?</p> <p>13 A. If I had a complaint, particularly of a 14 sexual -- not any complaint would get him fired -- 15 but a complaint of a sexual nature, then, yes, I 16 would've fired him immediately.</p> <p>17 Q. Well, what happened with Alana Goodman, 18 that's of a sexual nature, right?</p> <p>19 MR. CAVALIER: Object to form, foundation.</p> <p>20 THE WITNESS: If it happened. I don't 21 know when it happened. I was not aware of it. 22 There was not a complaint, so it was not part 23 of my decision making.</p> <p>24 BY MR. CARSON:</p>



Page 133	Page 135
<p>1 Q. Well, now you're aware of it today. Are 2 you gonna fire Gregg? 3 A. I am not gonna engage in hypotheticals. 4 Q. Well, are you gonna call Alana Goodman 5 after this and talk to her about the recording you 6 heard today? 7 A. I am not going to take your bait. 8 Q. Are you gonna investigate it? 9 A. I am not going to take your bait. 10 Q. It's not bait. It's a question, and you 11 have to answer it. Are you gonna investigate the 12 recording you just heard today? 13 MR. CAVALIER: Object to form, foundation. 14 THE WITNESS: I am not the Middle East 15 Forum den mother. I am not looking into 16 people's private lives, and if I did, I would 17 have no time for the Middle East, which is what 18 I work on. 19 BY MR. CARSON: 20 Q. You would have what? 21 A. No time for the Middle East, which is what 22 I work on. 23 Q. You don't have time to investigate this 24 stuff because you're not their den mother; is that</p>	<p>1 A. No idea. You have to ask them. 2 Q. Well, they told you that, didn't they? 3 A. I have no memory of that. 4 Q. Can you understand why it might've been 5 hard for some of them to come to you? 6 A. Not at all. 7 Q. You don't understand that? 8 A. No. I said come to me if you have any 9 problems. Don't hit me with surprises. Let me know 10 when there's a problem brewing. If something had 11 happened in Israel in early 2018, it was incumbent 12 upon Lisa to come to me and tell me about it, and 13 she didn't do so. 14 Q. Would you characterize yourself as having 15 a welcoming personality? 16 A. I am not going to take your bait, 17 Mr. Carson. 18 Q. I'm just -- I mean, the allegations in 19 this case are very personal to these women, right? 20 A. Yes, and they came to me November. They 21 could've come to me in -- in a timely manner. They 22 didn't, in particular the AIPAC and the Israel 23 events. I don't remember when the Marnie 24 conversation was, how much earlier, but these were</p>
Page 134	Page 136
<p>1 right? 2 MR. CAVALIER: Object to form. Object to 3 characterization. 4 MR. CARSON: I'm repeating your client's 5 testimony, Jon. I understand why you wanna 6 object, though. Trust me. 7 THE WITNESS: I am a Middle East 8 specialist. I am the head of an organization. 9 I deal with the organization. As you can see, 10 in early November I had a problem, I dealt with 11 it expeditiously, I investigated it, and I 12 mediated it, and everyone was content with it, 13 and I moved on, and they moved on. At least, 14 it appeared. I called them. To their faces, I 15 said you are my heroes and my angels. We're 16 gonna work together. We're gonna fix this. 17 And they said yes, and then you pop up and 18 cause a problem. 19 BY MR. CARSON: 20 Q. What was the last thing you said? 21 A. And then you pop up five months later, and 22 everything falls apart. 23 Q. All right. So you understood that these 24 women looked up to you, right, personally?</p>	<p>1 in the spring, and they came to me in the fall, some 2 six, seven, eight months later. That was wrong on 3 their part. And, as indicated earlier, the initial 4 information I had was Marnie's report, and Lisa 5 said, no, Gregg had not hit on her. So what am I to 6 think? Eight months, and the first report is that 7 she said no. 8 Q. Well, you did -- 9 A. -- seriously. I took it seriously, and I 10 took radical steps. I investigated, mediated, got 11 everyone into agreement, and removed Gregg from his 12 office role, retained his external role with the 13 projects, with fundraising, with dealing with the 14 media and the like. So I dealt with it fully and 15 satisfactorily to everyone's -- to everyone's 16 satisfaction. So why, in June 2019, we get hit with 17 five EEOC and then lawsuits is a little strange 18 since everyone said it was fine, and the two who 19 were not part of this didn't say a word, not a word. 20 Q. Well, Caitriona Brady did, right? 21 A. No, not a word. 22 Q. You don't think she was upset if Gregg -- 23 you don't think she was upset if Gregg Roman was 24 telling people that Marnie got her job by giving --</p>

Page 137	Page 139
<p>1 by trading sexual favors with her father?</p> <p>2 MR. CAVALIER: Object to form, foundation.</p> <p>3 THE WITNESS: In the first place, I'm not</p> <p>4 gonna attempt to ascertain how she felt. It's</p> <p>5 not my business. But, secondly, there was this</p> <p>6 rumor that Marnie ascribed to Gregg. Marnie</p> <p>7 has been proven to be a liar since then. I</p> <p>8 have no reason to believe what Marnie has said</p> <p>9 to them about that. Let me put it</p> <p>10 differently --</p> <p>11 MR. CARSON: Can you hear, because I'm</p> <p>12 having a really hard time.</p> <p>13 THE COURT REPORTER: It's very tough.</p> <p>14 THE WITNESS: Okay. First, I have no way</p> <p>15 of explaining to you what Brady's mental state</p> <p>16 was. I have no idea, and I'm not gonna answer</p> <p>17 that. Secondly, that rumor, we have never</p> <p>18 found out where it came from. Marnie ascribed</p> <p>19 it to Gregg. I have no reason to believe that</p> <p>20 that is the case. I don't know where it came</p> <p>21 from, but I have no reason to believe that</p> <p>22 Gregg was the source of it. So --</p> <p>23 BY MR. CARSON:</p> <p>24 Q. Why, because -- go ahead. You can finish.</p>	<p>1 Q. And Gregg denied it?</p> <p>2 A. Gregg denied it.</p> <p>3 Q. Was there any other reason besides Gregg's</p> <p>4 denial that you didn't believe it came from Gregg?</p> <p>5 A. I don't know where it came from. It may</p> <p>6 have come from Gregg; it may have come from Marnie;</p> <p>7 it may have come from Brady; it may have come from</p> <p>8 Lisa. I have no idea.</p> <p>9 Q. You think Marnie started the rumor about</p> <p>10 herself?</p> <p>11 A. [Inaudible].</p> <p>12 THE COURT REPORTER: What was that, sir?</p> <p>13 THE WITNESS: They were playing so many</p> <p>14 games. I don't know what they were --</p> <p>15 BY MR. CARSON:</p> <p>16 Q. Who was playing games?</p> <p>17 A. All of these people.</p> <p>18 Q. Who are you talking about when you say</p> <p>19 that?</p> <p>20 A. Marnie, Lisa, Tricia, Matt. Playing</p> <p>21 games. The very first --</p> <p>22 Q. Marnie, Tricia, Lisa, Matt. Who else?</p> <p>23 A. Those four. The very first memo, the</p> <p>24 handwritten memo, was all about the games. Matt's</p>
Page 138	Page 140
<p>1 A. Finished.</p> <p>2 Q. Why, because Gregg denied it? That's why</p> <p>3 you don't think it came from him?</p> <p>4 A. Because there's a tissue of lies about</p> <p>5 this.</p> <p>6 Q. Where'd that --</p> <p>7 A. Tissue of lies.</p> <p>8 Q. Where'd that tissue of lies begin?</p> <p>9 A. Where'd it begin? I don't know where it</p> <p>10 began. There's just so many of them.</p> <p>11 Q. Well, when is the first time you heard</p> <p>12 about this rumor? And by "rumor," I think we're</p> <p>13 both talking about the same thing. There was a</p> <p>14 rumor that Gregg Roman said that Caitriona Brady's</p> <p>15 father had traded sexual favors with Marnie.</p> <p>16 A. No. The rumor was that Marnie's -- that</p> <p>17 Marnie had sexual relations with Brady's father in</p> <p>18 order to get a job.</p> <p>19 Q. Okay.</p> <p>20 A. Wasn't Gregg's rumor. It was a rumor.</p> <p>21 Q. Let's just characterize it as a rumor for</p> <p>22 now. So you did hear that Gregg started the rumor,</p> <p>23 correct?</p> <p>24 A. Marnie told me that. Yes.</p>	<p>1 doing this to push Lisa to take a job she can't</p> <p>2 handle so that Tricia can take over her job. I</p> <p>3 mean, I had no idea this was taking place, and then</p> <p>4 after -- after that, it kept on going. Matt wanted</p> <p>5 the directorship. Marnie wanted the directorship.</p> <p>6 Lisa wanted directorship. Everybody was after</p> <p>7 Gregg's position, playing games. I don't know</p> <p>8 what -- I don't know what the specific tactics were,</p> <p>9 but I know that they were playing games.</p> <p>10 Q. Earlier you said you didn't know what</p> <p>11 Brady's mental state was, right?</p> <p>12 A. Yes.</p> <p>13 Q. That's Caitriona Brady?</p> <p>14 A. Correct.</p> <p>15 Q. Why are you questioning her mental state?</p> <p>16 MR. CAVALIER: Object to form. Object to</p> <p>17 the characterization.</p> <p>18 BY MR. CARSON:</p> <p>19 Q. Why are you questioning her mental state?</p> <p>20 A. You asked me if she did not feel this or</p> <p>21 that, and I said I have no idea what she felt. I</p> <p>22 did not talk to her about it, and I'm not gonna</p> <p>23 guess at what she was feeling.</p> <p>24 Q. You didn't talk to her about it?</p>

Page 141	Page 143
<p>1 A. I talked to her not at all about this.</p> <p>2 Q. Don't you think that you owed it to her to</p> <p>3 talk to her about it?</p> <p>4 MR. CAVALIER: Object to form, foundation.</p> <p>5 THE WITNESS: If she had wanted to talk to</p> <p>6 me, she could've come to me. [Inaudible] that</p> <p>7 I was looking to see if he had done anything</p> <p>8 wrong after November and that I was eager to</p> <p>9 learn of any -- anything wrong he did,</p> <p>10 particularly in the sexual area. Nobody came</p> <p>11 to me.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. How long did your investigation take?</p> <p>14 A. Investigation of what?</p> <p>15 Q. You testified earlier that, as part of the</p> <p>16 investigation, you interviewed everyone in the</p> <p>17 office. How long did that investigation take?</p> <p>18 A. It dominated a week of mine from the 1st</p> <p>19 of November till the 7th or 8th or so. This letter</p> <p>20 that you have up here is dated, I think, the 8th, so</p> <p>21 that's a full week from the 1st. Something on the</p> <p>22 order of [inaudible].</p> <p>23 Q. Sorry. I didn't hear the last thing you</p> <p>24 said.</p>	<p>1 Q. Okay. So --</p> <p>2 A. Or, I should say, in the case of the staff</p> <p>3 who are not in the office, I wrote to them.</p> <p>4 Q. Fair enough.</p> <p>5 A. Personal communication between me and</p> <p>6 them, one-to-one, which I then shared with Marc, and</p> <p>7 we worked out resolutions and solutions.</p> <p>8 Q. As far as the -- as far as the -- the</p> <p>9 rumor about Caitriona Brady's father and Marnie</p> <p>10 Meyer, that wasn't done that week, correct? That</p> <p>11 was done at a later date?</p> <p>12 A. That was well into 2019. Yes.</p> <p>13 Q. And did you investigate that in any way?</p> <p>14 A. I tried, but I hit a brick wall.</p> <p>15 Everything was contradictory. At a certain point, I</p> <p>16 just couldn't figure out who was saying what to</p> <p>17 whom.</p> <p>18 Q. Wasn't it true that everyone was telling</p> <p>19 you Gregg Roman said it except Gregg Roman?</p> <p>20 A. No.</p> <p>21 Q. What did Lisa tell you about it? Did you</p> <p>22 interview Lisa?</p> <p>23 A. I did, and I can't tell you specifically</p> <p>24 who said what, but I remember that some thought it</p>
Page 142	Page 144
<p>1 A. Something on the order of a week. Nothing</p> <p>2 else. Talked to Marc incessantly, talked to others</p> <p>3 at great length, asked lots of questions, discussed</p> <p>4 with Marc what steps to take. Marc was my legal</p> <p>5 and -- my legal confidant who worked with me on</p> <p>6 fixing this.</p> <p>7 Q. Who was your legal confidant? Oh, Marc</p> <p>8 Fink, your house counsel, correct?</p> <p>9 A. Yes.</p> <p>10 Q. Yeah. You don't have to tell me what he</p> <p>11 said. Let me think. So when you say that it took a</p> <p>12 week, was that to do all the interviews or what --</p> <p>13 why did it take a week? What did you do throughout</p> <p>14 that week?</p> <p>15 A. Interviewed, I discussed with Marc, I came</p> <p>16 up with different ideas. Essentially, it was a week</p> <p>17 intensely talking to Marc, gathering information,</p> <p>18 and figuring out solutions.</p> <p>19 Q. Did you look at any phone records during</p> <p>20 the course of the investigation?</p> <p>21 A. I did not. I talked to people.</p> <p>22 Q. Did you read emails or Slacks or Telegrams</p> <p>23 or WhatsApps or anything like that?</p> <p>24 A. Nothing. I only talked to people.</p>	<p>1 was Marnie who had come up with it; some thought</p> <p>2 Lisa who had come up with it; and some thought Gregg</p> <p>3 had come up with it.</p> <p>4 Q. Who thought Lisa came up with it?</p> <p>5 A. I can't remember the specifics.</p> <p>6 Q. Just Gregg Roman, right?</p> <p>7 MR. CAVALIER: Object to form.</p> <p>8 THE WITNESS: I -- I don't know.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. Did you send Lisa any emails about it</p> <p>11 letting her know that we interview -- you conducted</p> <p>12 this investigation?</p> <p>13 A. [Inaudible].</p> <p>14 THE COURT REPORTER: I can't rem -- I</p> <p>15 can't hear you, sir.</p> <p>16 THE WITNESS: I don't think so. Don't</p> <p>17 remember if she should, but I don't think so.</p> <p>18 MR. CARSON: I really need to take a</p> <p>19 bathroom break. I'm sorry. I can't -- just go</p> <p>20 off the record for a minute, guys. I'm sorry</p> <p>21 about that.</p> <p>22 THE VIDEOGRAPHER: All right. The time</p> <p>23 is --</p> <p>24 MR. CARSON: I'll do as long as you want</p>

Page 145	Page 147
<p>1 Jon, but I only need like three minutes. I 2 just gotta run to the bathroom. 3 MR. CAVALIER: If we're gonna break -- 4 like I always say, if we're gonna break, I'd 5 rather break for at least ten just so it can 6 actually be a break. 7 MR. CARSON: Yeah, that's fine. All 8 right. So we'll come back in like 1:21 or 9 something like that. 10 MR. CAVALIER: That works. 11 THE VIDEOGRAPHER: The time is 1:11, and 12 we are off the record. 13 --- 14 (Whereupon there was a recess in the 15 proceeding from 1:11 p.m. to 1:24 p.m.) 16 --- 17 THE VIDEOGRAPHER: It is 1:24 a.m. -- 18 excuse me -- p.m. Eastern Time, and we are now 19 on the record. 20 BY MR. CARSON: 21 Q. Mr. Pipes, did Gregg Roman ever tell you 22 that he could destroy you? 23 A. No. 24 Q. Did he ever tell anyone else that?</p>	<p>1 don't fire him? 2 MR. CAVALIER: Object to form. 3 THE WITNESS: No. 4 BY MR. CARSON: 5 Q. I mean, a lot of women have complained 6 about Gregg Roman's misconduct now, right? 7 A. Thanks to the Derek Smith Law Group, yes. 8 Q. Well, are we responsible for Samantha 9 Mandeles complaining about him? 10 A. Don't know about that. 11 Q. I'm sorry? 12 A. I don't know about that. 13 Q. Are we responsible for Lea Merville 14 [phonetic] complaining about him? 15 MR. CAVALIER: Object to form. 16 THE WITNESS: Don't know about that. 17 BY MR. CARSON: 18 Q. You don't what? 19 A. I don't know about that. 20 Q. Did you ever talk to Lea Merville? 21 A. No. 22 Q. You never called her in your entire life? 23 A. I think I met her when she began as an 24 intern.</p>
Page 146	Page 148
<p>1 MR. CAVALIER: Object to form. 2 THE WITNESS: Ask him. 3 THE COURT REPORTER: Sorry, Seth. What 4 was the question? 5 MR. CARSON: Did he ever tell anybody else 6 that? 7 MR. CAVALIER: Object to form. 8 THE WITNESS: Ask him. 9 BY MR. CARSON: 10 Q. And you said "ask him". Did anyone ever 11 tell you that he said that? 12 A. No, not that I remember. 13 Q. Do you know why Gregg Roman would think he 14 can destroy you? 15 MR. CAVALIER: Object to form, foundation. 16 If you can answer it, go for it. 17 THE WITNESS: No. 18 BY MR. CARSON: 19 Q. Are you worried about him being able to 20 destroy you? 21 MR. CAVALIER: Same objection. 22 THE WITNESS: No. 23 BY MR. CARSON: 24 Q. Is that why, no matter what he does, you</p>	<p>1 Q. Well, when you interviewed her during your 2 investigation into the reports of sexual misconduct, 3 what did she say? 4 A. I did not -- 5 MR. CAVALIER: Object to form, foundation. 6 BY MR. CARSON: 7 Q. Why didn't you interview her? 8 A. She did not complain. She was not an 9 employee, and she did not complain. 10 Q. Didn't your director of human resources 11 include her in a written complaint that was 12 submitted to you in November? 13 A. What Seth [sic] does with his personal 14 life is not my concern. My concern was that there 15 was a large-scale complaint from many staff in the 16 office about Gregg. 17 Q. Did you just say when Seth does? 18 A. I did not. 19 Q. Did he say when Seth does? 20 A. I did not. I said large-scale. 21 Q. Okay. 22 A. Large-scale complaint. 23 Q. I think you meant if Gregg does. I just 24 wasn't [inaudible]. So, for the record, if you said</p>



Page 149	Page 151
<p>1 ---</p> <p>2 Seth, I think you meant Gregg. What Gregg does --</p> <p>3 A. I was not talking about you. I was</p> <p>4 talking about Gregg.</p> <p>5 Q. So don't you find it disturbing, though,</p> <p>6 the allegation that was made in connection with Lea</p> <p>7 Merville?</p> <p>8 MR. CAVALIER: Object to form.</p> <p>9 THE WITNESS: What allegation?</p> <p>10 BY MR. CARSON:</p> <p>11 Q. Well, there was an allegation that he</p> <p>12 subjected Lea Merville to quid pro quo sexual</p> <p>13 harassment, right?</p> <p>14 THE COURT REPORTER: What was that, Seth?</p> <p>15 MR. CARSON: Quid pro -- he subjected Lea</p> <p>16 Merville to quid pro quo sexual harassment.</p> <p>17 MR. CAVALIER: Object to form and</p> <p>18 foundation.</p> <p>19 THE WITNESS: That there are rumors going</p> <p>20 around are not my concern. If Lea Merville</p> <p>21 came to me and said there was a problem, I</p> <p>22 would've dealt with that. I'm not gonna deal</p> <p>23 with rumors.</p> <p>24 BY MR. CARSON:</p> <p>Q. When the director of human resources comes</p>	<p>1 ---</p> <p>2 it?</p> <p>3 MR. CAVALIER: Object to form and</p> <p>4 foundation.</p> <p>5 THE WITNESS: I don't know.</p> <p>6 BY MR. CARSON:</p> <p>7 Q. I mean, there was a recording we heard</p> <p>8 today where a Washington Examiner reporter said that</p> <p>9 Gregg Roman tried to lure her to his hotel room to</p> <p>10 trade sex for stories, right? That's what we heard</p> <p>11 today?</p> <p>12 MR. CAVALIER: Object to the</p> <p>13 categorization, the lack of foundation, the</p> <p>14 description of the recording, and essentially</p> <p>15 everything else you just said, but to the</p> <p>16 extent you can answer --</p> <p>17 MR. CARSON: Yeah, of course. I know.</p> <p>18 Just object to the whole question because why</p> <p>19 answer when this has nothing to do --</p> <p>20 everything to do with the case.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Okay. So she said that he told her, I</p> <p>23 have a killer story. She said -- she said, Alana,</p> <p>24 tell him why you should have the story. You and me</p> <p>should be in an arrangement. He then whipped out</p>
Page 150	Page 152
<p>1 ---</p> <p>2 to you, it rises above being just a rumor at that</p> <p>3 point, correct?</p> <p>4 MR. CAVALIER: Object to form.</p> <p>5 THE WITNESS: That is a hypothetical.</p> <p>6 BY MR. CARSON:</p> <p>7 Q. Well, it's not a hypothetical. Marnie</p> <p>8 Meyer, in fact, came to you and included allegations</p> <p>9 about Lea Merville in a written report to you</p> <p>10 submitted to you in November 2018, correct?</p> <p>11 A. Yes.</p> <p>12 Q. And the allegations concerning Lea</p> <p>13 Merville was that Gregg Roman lured her to a hotel</p> <p>14 room because she needed a document signed?</p> <p>15 A. If Lea Merville had come to me and</p> <p>16 complained, I would've dealt with it. There was a</p> <p>17 rumor that Marnie Meyer retold to me. I did not pay</p> <p>18 attention. I paid attention to my staff who had a</p> <p>19 large complaint about Gregg. They were very unhappy</p> <p>20 with him for a whole range of reasons. I put</p> <p>21 everything else aside, and I devoted a week to</p> <p>22 dealing with this to their satisfaction.</p> <p>23 Q. The allegation that Lea -- that concerned</p> <p>24 Lea Merville is eerily similar to the allegation</p> <p>that we listened to today on the recording, isn't</p>	<p>1 ---</p> <p>2 his penis. She was embarrassed for him. He then</p> <p>3 screamed across the -- across the -- you know, from</p> <p>4 outside what room number he's in and said, you have</p> <p>5 30 minutes to be here. I mean, it's the exact same</p> <p>6 thing that Lea Merville was -- what was reported in</p> <p>7 connection with Lea Merville, right?</p> <p>8 MR. CAVALIER: Object to form, foundation,</p> <p>9 lack of authenticity.</p> <p>10 ---</p> <p>11 (Indistinguishable cross-talk.)</p> <p>12 ---</p> <p>13 THE WITNESS: I believe we're dealing with</p> <p>14 a legal process, and a legal process is not</p> <p>15 about hearsay; it's about individuals speaking</p> <p>16 on the record for themselves. Neither Alana</p> <p>17 Goodman nor Lea Merville has ever contacted me</p> <p>18 for anything related to Gregg, and, therefore,</p> <p>19 they were not my concern. My concern were the</p> <p>20 employees of the Middle East Forum who</p> <p>21 complained to me in person about specifics, and</p> <p>22 I put everything else aside in my life and</p> <p>23 spent a week to deal with those issues. I</p> <p>24 investigated them and I mitigated them to their</p> <p>entire satisfaction. They signed documents</p>



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 1 indicating they were happy with the resolution.  
 2 Gregg signed a document saying he was happy  
 3 with the resolution. He was content with  
 4 the -- "happy" is too strong a word. Everyone  
 5 was content with the resolution. May not be  
 6 ideal, but it was content -- they were  
 7 contented with it. I did not need to go into  
 8 other matters, and I will not be baited into  
 9 getting into those matters here. I dealt with  
 10 the issues in front of me effectively, to  
 11 everyone's contentment.

12 BY MR. CARSON:

13 Q. The matters we're talking about are the  
 14 subject of this case, though, aren't they?

15 MR. CAVALIER: Object to form.

16 THE WITNESS: As I understand, there are  
 17 three plaintiffs at this point. None of them  
 18 are named Lea Merville or Alana Goodman.

19 BY MR. CARSON:

20 Q. But they told you when they made their  
 21 complaints in November of 2018 that Lea Merville  
 22 had -- had said these things, correct?

23 MR. CAVALIER: Object to form.

24 THE WITNESS: Marnie repeated a rumor

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 1 about this. Yes.

2 BY MR. CARSON:

3 Q. And Daniel -- strike that. And Lisa  
 4 Barbounis, my client, said that, as part of the  
 5 sexual harassment that she was subjected to, Gregg  
 6 Roman described in detail him having sex with Lea  
 7 Merville. That's why it's relevant to this case.  
 8 Do you understand?

9 MR. CAVALIER: Object to form, if that's a  
 10 question.

11 BY MR. CARSON:

12 Q. Do you understand that that's the  
 13 relevancy of this case? When your supervisor  
 14 decides he's gonna tell the person that he's in  
 15 charge of intimate details about his sexual life,  
 16 that's sexual harassment, right?

17 MR. CAVALIER: Object to form. Object to  
 18 calling for a legal conclusion as well.

19 MR. CARSON: You don't need to say  
 20 [inaudible].

21 BY MR. CARSON:

22 Q. It's sexual harassment. It's unwelcome  
 23 sexual comments, right?

24 A. From what I understand, Lisa and Gregg had

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 1 a close personal relationship in which they told  
 2 each other all sorts of things about their lives,  
 3 including their bodily issues, sexual issues, their  
 4 relationships with all sorts of people and the like.  
 5 That is their business, not mine.

6 Q. Are they on equal footing?

7 A. They were supervisor and supervisee. They  
 8 became friends, and that was a mistake. That's at  
 9 the heart of this, that Gregg should not have done  
 10 that. He made a mistake.

11 Q. It's more than just supervisor and  
 12 supervisee, though, right, because Gregg Roman's  
 13 also a corporate officer of the entity, the Middle  
 14 East Forum, correct?

15 A. What is your question?

16 Q. Do you know what proxy liability is?

17 A. No, I don't.

18 MR. CAVALIER: Object to form.

19 BY MR. CARSON:

20 Q. Well, Gregg Roman is a corporate officer  
 21 of the Middle East Forum, so the conduct and  
 22 comments that he made, those conduct and comments  
 23 are from the Middle East Forum.

24 MR. CAVALIER: Is that a --

---  
 1 BY MR. CARSON:

2 Q. That's the relationship [inaudible],  
 3 correct?

4 A. I have no idea.

5 MR. CAVALIER: Object to the --

6 THE WITNESS: No, I don't. I know the  
 7 Middle East.

8 BY MR. CARSON:

9 Q. Do you equate your job as having a  
 10 responsibility to the women who work with Gregg  
 11 Roman?

12 MR. CAVALIER: Object to form.

13 BY MR. CARSON:

14 Q. Strike that. Let me ask a better  
 15 question: Do you have a responsibility to the women  
 16 who work at the Middle East Forum?

17 A. No. I have a responsibility to the  
 18 employees of the Middle East Forum, whatever their  
 19 gender might be.

20 Q. But if a lot of women are complaining  
 21 about sexual misconduct in their employment, don't  
 22 you have a responsibility to -- to those women?

23 A. I had three complaints on November 1st  
 24 about Gregg in a sexual context. I investigated

Page 157	Page 159
<p>1 ---</p> <p>2 them, and I mitigated them to their satisfaction.</p> <p>3 MR. CARSON: Sorry. Can you read -- I'm</p> <p>4 sorry -- I just got distracted. Can you read</p> <p>5 back his answer?</p> <p>6 ---</p> <p>7 (Whereupon the court reporter read back</p> <p>8 the pertinent testimony.)</p> <p>9 ---</p> <p>10 THE WITNESS: I investigated them, and I</p> <p>11 mitigated them to their satisfaction.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. You don't see yourself as having some</p> <p>14 particularized responsibility to make sure the women</p> <p>15 at the Middle East Forum who complained about sexual</p> <p>16 harassment are protected?</p> <p>17 MR. CAVALIER: Object to form. Asked and</p> <p>18 answered.</p> <p>19 THE WITNESS: Yes, and, accordingly, I</p> <p>20 removed Gregg from the office and from any</p> <p>21 direct contact with them in a physical presence</p> <p>22 in their life, and I protected them entirely.</p> <p>23 They were content with that protection until</p> <p>24 you came along five months later and decided it</p> <p>wasn't good enough.</p>	<p>1 ---</p> <p>2 Q. Is the Middle East Forum a victim in this</p> <p>3 case?</p> <p>4 A. Of course it is. Of course it is. \$31</p> <p>5 million for what, for made up stuff? Tricia McNulty</p> <p>6 tells me that he sat too close to her, and then the</p> <p>7 complaint comes in. Oh, he tried to touch her</p> <p>8 bottom. Oh, really? Somehow it magically changed</p> <p>9 between November and June. Wonder how that</p> <p>10 happened. Sex trafficking? Oh, where did that come</p> <p>11 from? Sexual assault? Where did all these things</p> <p>12 come from? Who came up with sex trafficking?</p> <p>13 Mr. Carson, who came up with sex trafficking?</p> <p>14 Q. The United States Congress, Mr. Pipes.</p> <p>15 A. United States Congress did not apply to</p> <p>16 Gregg Roman; Seth Carson did.</p> <p>17 Q. Have you ever read the statute because --</p> <p>18 A. I've read what you have produced and what</p> <p>19 words you put into their mouths.</p> <p>20 Q. Have you ever read the sex trafficking</p> <p>21 statute --</p> <p>22 ---</p> <p>23 (Indistinguishable cross-talk.)</p> <p>24 ---</p> <p>THE WITNESS: I do not need to know about</p>
Page 158	Page 160
<p>1 ---</p> <p>2 BY MR. CARSON:</p> <p>3 Q. I know. It's my fault. I get it. It's</p> <p>4 not your fault in any way, correct?</p> <p>5 A. They signed documents saying they were</p> <p>6 content with it. Nobody complained after that</p> <p>7 point, after they signed the documents.</p> <p>8 Q. So you don't feel responsible for anything</p> <p>9 at all?</p> <p>10 MR. CAVALIER: Object to form.</p> <p>11 ---</p> <p>12 (Indistinguishable cross-talk.)</p> <p>13 ---</p> <p>14 THE WITNESS: I investigated and I</p> <p>15 mitigated the problem to everyone's</p> <p>16 satisfaction. All four individuals directly</p> <p>17 involved were content with my resolution of it.</p> <p>18 I thought everything was fine. They indicated</p> <p>19 everything was fine. I refer you to the</p> <p>20 photographs of May 19th, 2019 at our gala in</p> <p>21 New York -- big smiles in a chorus line with</p> <p>22 Gregg and others. Everything was fine, and</p> <p>23 then all of a sudden we got big problems. Why?</p> <p>24 Well, Derek Smith Law Group entered the scene.</p> <p>BY MR. CARSON:</p>	<p>1 ---</p> <p>2 the details of sex trafficking laws. I need to</p> <p>3 know that that's what you claimed.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. So you don't know whether it applies to</p> <p>6 this situation or not, do you?</p> <p>7 A. I know perfectly well that you make things</p> <p>8 up as you need to claim your \$31 million, of which</p> <p>9 you get, what, 40 percent? How much does that come</p> <p>10 to, Mr. Carson? That seems to come to about \$14</p> <p>11 million for you. That's a nice payday.</p> <p>12 Q. That's what you think --</p> <p>13 A. Good luck with that, Mr. Carson. I'll let</p> <p>14 you know that we're not gonna be paying you. We're</p> <p>15 gonna fight you tooth and nail, as you can see.</p> <p>16 Q. Right. And then --</p> <p>17 A. Good luck with your \$14 million.</p> <p>18 Q. If there's a judgment, you'll end up</p> <p>19 paying it, correct?</p> <p>20 A. And so far, let me point out, Mr. Carson,</p> <p>21 you have paid us, not we have paid you. Due to your</p> <p>22 mistakes, you have paid us, and, indeed, just a few</p> <p>23 minutes ago, you got another problem with Judge</p> <p>24 Wolson, didn't you?</p> <p>Q. How much money have you received from our</p>

Page 161	Page 163
<p>1 firm?</p> <p>2 A. Something on the order of \$5,000.</p> <p>3 Q. And that was profit for you guys?</p> <p>4 A. No.</p> <p>5 MR. CAVALIER: Object to form.</p> <p>6 THE WITNESS: It was the money that we had</p> <p>7 to pay our lawyers because of your -- your</p> <p>8 actions.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. So how much money have you made from our</p> <p>11 firm?</p> <p>12 MR. CAVALIER: Object to form.</p> <p>13 THE WITNESS: -- \$5,000.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. You've made \$5,000?</p> <p>16 A. We didn't make it. We paid it to our</p> <p>17 lawyers because they had to spend time dealing with</p> <p>18 the things you raised wrongly.</p> <p>19 Q. When did you pay it to your lawyer?</p> <p>20 MR. CAVALIER: Object to form. Hold up,</p> <p>21 hold up. Do not answer any questions about</p> <p>22 bills or payments or --</p> <p>23 MR. CARSON: He raised the issue, Jon, not</p> <p>24 me.</p>	<p>1 A. I don't know why. Something to do with</p> <p>2 her busyness or something, but --</p> <p>3 Q. Isn't it -- go ahead. You wanna finish?</p> <p>4 A. But he invited Lisa to go to Israel to do</p> <p>5 work with him. That was not sex trafficking.</p> <p>6 Q. Isn't it -- did you know that she went?</p> <p>7 A. I know that she went now. At the time, I</p> <p>8 did not.</p> <p>9 Q. He hid it from you, correct?</p> <p>10 A. He hid it from me. And, by the way, so</p> <p>11 did Lisa hide it from me. The two of them were</p> <p>12 complicit in hiding it from me.</p> <p>13 Q. Well, Lisa was following instructions,</p> <p>14 though, right?</p> <p>15 A. Lisa hid it from me. Gregg hid it from</p> <p>16 me, and I --</p> <p>17 Q. Lisa was following the instructions of her</p> <p>18 supervisor?</p> <p>19 A. Lisa hid it. She was upset by -- if she</p> <p>20 had a problem with it, she could've come to me. As</p> <p>21 you have pointed out repeatedly, I was the ultimate</p> <p>22 authority. And when she did come to me on November</p> <p>23 1st, I took action. So why didn't she come to me</p> <p>24 back in March or April when she had a problem?</p>
Page 162	Page 164
<p>1 MR. CAVALIER: The instruction stands.</p> <p>2 THE WITNESS: So far, you have paid us.</p> <p>3 We have not paid you. I remind you of that.</p> <p>4 And you have more problems on your docket,</p> <p>5 don't you? Daily reports to the judge.</p> <p>6 Remember those, Mr. Carson.</p> <p>7 BY MR. CARSON:</p> <p>8 Q. I'm gonna direct you back to the question</p> <p>9 that we were discussing a moment ago in connection</p> <p>10 with the sex trafficking statute. Have you ever</p> <p>11 reviewed that statute before?</p> <p>12 A. I deal with the Middle East, Mr. Carson.</p> <p>13 I don't read sex trafficking statutes, but I know</p> <p>14 what the term means, and I know that Gregg did not</p> <p>15 engage in sex trafficking.</p> <p>16 Q. Well, if you lure someone across national</p> <p>17 borders in order to try to engage them in sexual</p> <p>18 intercourse, isn't that what the statute states?</p> <p>19 A. Only a perverted mind like your own would</p> <p>20 come up with an interpretation like that. He went</p> <p>21 there to work. He asked Matt Bennett first, he</p> <p>22 asked Marnie Meyer second, and he asked Lisa</p> <p>23 Barbounis third.</p> <p>24 Q. Why didn't Marnie Meyer wanna go?</p>	<p>1 Q. Wasn't she just following the instructions</p> <p>2 of her supervisor?</p> <p>3 A. She hid it from me. She was complicit in</p> <p>4 hiding it from me, and when she decided no longer</p> <p>5 could it be complicit, it was eight months -- seven,</p> <p>6 eight months later. How come she didn't do it at</p> <p>7 the time, Mr. Carson? Maybe because nothing</p> <p>8 happened at the time, and she was only looking for a</p> <p>9 vehicle with which to come to me en masse, all three</p> <p>10 of them, and find a reason to get my attention.</p> <p>11 They felt safety in numbers, safety in arguing for</p> <p>12 sexual harassment. I don't know why. There was no</p> <p>13 indication that I would not take it seriously</p> <p>14 individually back in the spring, but that's what</p> <p>15 they chose to do. So she was complicit. They both</p> <p>16 did something wrong, and I've admonished Gregg.</p> <p>17 Q. What did Gregg do wrong?</p> <p>18 A. He hid it from me.</p> <p>19 Q. Isn't the reason that he didn't want</p> <p>20 Marnie -- isn't the reason Marnie didn't wanna go is</p> <p>21 because Gregg told her that she would have to share</p> <p>22 a room with him?</p> <p>23 MR. CAVALIER: Object to form.</p> <p>24 THE WITNESS: Ask her. Don't ask me her</p>

Page 165	Page 167
<p>1 reasoning.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. Sorry?</p> <p>4 A. Ask her, not me.</p> <p>5 Q. Well, isn't that her plea?</p> <p>6 A. I don't know.</p> <p>7 Q. You don't know what her claims are in her</p> <p>8 case?</p> <p>9 MR. CAVALIER: Object to form.</p> <p>10 THE WITNESS: -- talking about Lisa</p> <p>11 Barbounis now.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. But you testified that he didn't try to</p> <p>14 lure her there for sex.</p> <p>15 A. That's correct. He took her there to do</p> <p>16 work, and apparently she did do work.</p> <p>17 Q. But the work could only be done if they</p> <p>18 shared a hotel room together or an Airbnb together?</p> <p>19 MR. CAVALIER: Object to form, foundation.</p> <p>20 THE WITNESS: I know nothing about their</p> <p>21 arrangements and why they had the arrangements</p> <p>22 they did. Ask --</p> <p>23 BY MR. CARSON:</p> <p>24 Q. Well, isn't it evidence of the reason why</p>	<p>1 we're definitely gonna call the judge if you</p> <p>2 make that instruction.</p> <p>3 THE WITNESS: I think I --</p> <p>4 MR. CARSON: Not a choice. You can't</p> <p>5 instruct someone not to answer based on lack of</p> <p>6 foundation.</p> <p>7 ---</p> <p>8 (Indistinguishable cross-talk.)</p> <p>9 ---</p> <p>10 MR. CAVALIER: You're mischaracterizing --</p> <p>11 you're mischaracterizing the allegations --</p> <p>12 MR. CARSON: Here is where you try to help</p> <p>13 him testify. Go ahead, Jon. Tell him what to</p> <p>14 say.</p> <p>15 MR. CAVALIER: You're asking me to explain</p> <p>16 my objection. I have to do that.</p> <p>17 MR. CARSON: -- to say. Take a minute.</p> <p>18 I'll allow you to tell him what to say. Go</p> <p>19 ahead.</p> <p>20 MR. CAVALIER: I stand on the instruction.</p> <p>21 THE WITNESS: I can answer. Jon, I would</p> <p>22 like to --</p> <p>23 MR. CARSON: What does it indicate to --</p> <p>24 ---</p>
Page 166	Page 168
<p>1 he wanted to bring her, that Marnie Meyer wouldn't</p> <p>2 go unless -- that he wouldn't let Marnie Meyer go</p> <p>3 unless she shared a room with him?</p> <p>4 MR. CAVALIER: Object to form.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. Doesn't that indicate something to you,</p> <p>7 Mr. Pipes?</p> <p>8 A. Ask Marnie Meyer.</p> <p>9 Q. The question's not directed to Marnie</p> <p>10 Meyer. It's directed to you. What do you think it</p> <p>11 indicates -- I'll strike that. I'll ask another</p> <p>12 question. What do you think it indicates that he</p> <p>13 would only allow her to come if she shared a room</p> <p>14 with him?</p> <p>15 MR. CAVALIER: Are you asking a</p> <p>16 hypothetical?</p> <p>17 MR. CARSON: No.</p> <p>18 MR. CAVALIER: Then I'm objecting on lack</p> <p>19 of foundation, and I'm instructing him not to</p> <p>20 answer it.</p> <p>21 MR. CARSON: You can't instruct him not to</p> <p>22 answer.</p> <p>23 MR. CAVALIER: I just did.</p> <p>24 MR. CARSON: Well, you have to answer or</p>	<p>1 (Indistinguishable cross-talk.)</p> <p>2 ---</p> <p>3 THE COURT REPORTER: Guys, come on.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. The question that I asked was, what does</p> <p>6 it indicate to you that he didn't want Marnie to go</p> <p>7 unless she shared a room with him?</p> <p>8 A. It indicates to me that Marnie was</p> <p>9 building a case against Gregg to show that he had</p> <p>10 behaved badly. And so, at a later date, she decided</p> <p>11 to give this as an explanation. Whether or not that</p> <p>12 was the explanation at the time, I do not know</p> <p>13 because she did not tell me. If she were upset</p> <p>14 about being invited to Israel with Gregg to share an</p> <p>15 Airbnb -- if that was, in fact, the case -- she</p> <p>16 should've told me in February, March, April,</p> <p>17 whenever it was when she got that offer. She did</p> <p>18 not. She came to me in November, and she did not</p> <p>19 mention that to me. That came up later when you,</p> <p>20 Mr. Carson, entered the case, and you decided to</p> <p>21 find all sorts of reasons to impugn Gregg Roman, so</p> <p>22 I --</p> <p>23 Q. Sure about that?</p> <p>24 A. Hm?</p>



Page 169	Page 171
<p>---</p> <p>1 Q. You sure?</p> <p>2 A. I'm not sure of the dates, but I know that</p> <p>3 she didn't tell me that in November. That came --</p> <p>4 Q. It wasn't in the letter?</p> <p>5 A. In the letter, I don't think so, no.</p> <p>6 Q. Well, we'll have plenty of time to look at</p> <p>7 the letter today but --</p> <p>8 A. In any case, she did not come to me at the</p> <p>9 time in February, March, April, whenever it took</p> <p>10 place and tell me, Gregg made an inappropriate offer</p> <p>11 to me to go to Israel and to stay in a hotel room</p> <p>12 with him -- in an Airbnb with him. She did not do</p> <p>13 that. She was complicit as well in hiding this from</p> <p>14 me. I did not know about it until she wrote me that</p> <p>15 memo in early November. Of that I am positive. I</p> <p>16 knew nothing of this trip. I knew the trip -- I</p> <p>17 knew Gregg went. I knew nothing about Lisa going</p> <p>18 there. I knew nothing about Marnie being invited.</p> <p>19 I knew nothing about the Airbnb. I knew nothing</p> <p>20 about the alleged assault. Call it what you will.</p> <p>21 Knew nothing until November. So all of them were</p> <p>22 complicit in hiding this from me, and then later --</p> <p>23 months, months later, eight months later -- they</p> <p>24 decide, oh, Gregg did all these things, and Marnie</p>	<p>---</p> <p>1 Mr. Roman of putting his foot up her butt?</p> <p>2 A. Yes, yes, of course.</p> <p>3 Q. Can you understand why it might be hard</p> <p>4 for women to report sexual misconduct?</p> <p>5 MR. CAVALIER: Object to form.</p> <p>6 THE WITNESS: I have a question why it's</p> <p>7 hard to report it in March, and it's possible</p> <p>8 to report it in November. They did report it,</p> <p>9 and I acted expeditiously and satisfactorily.</p> <p>10 So they had no complaints about my actions, so</p> <p>11 I don't understand why -- okay, it's difficult</p> <p>12 to bring up these personal issues, sexual</p> <p>13 issues, of course. But if it's possible to</p> <p>14 bring it up in November, why couldn't they have</p> <p>15 brought it up in the spring? Why couldn't</p> <p>16 Marnie and Lisa have come to me together and</p> <p>17 said, oh, we have a problem with Gregg because</p> <p>18 he invited us to an Airbnb, and he wanted to</p> <p>19 keep it secret from you. Why didn't they do</p> <p>20 that? What kind of credibility do they have</p> <p>21 when they -- don't interrupt me -- when they</p> <p>22 don't deal with it expeditiously, but wait</p> <p>23 eight months and wait to recruit another</p> <p>24 person, and then five months after that --</p>
Page 170	Page 172
<p>---</p> <p>1 even tells me that she asked Lisa, did Gregg hit on</p> <p>2 you in Israel, and Lisa -- quote, "Lisa said no,"</p> <p>3 unquote. So what am I supposed to take seriously?</p> <p>4 Q. Did you ever read that email?</p> <p>5 A. What do you mean?</p> <p>6 MR. CAVALIER: Object to form. What</p> <p>7 email?</p> <p>8 BY MR. CARSON:</p> <p>9 Q. I don't know. Are you testifying you got</p> <p>10 on email?</p> <p>11 A. No one said that.</p> <p>12 Q. When did Marnie ask Lisa if something</p> <p>13 happened in Israel and she said --</p> <p>14 A. -- the handwritten note -- one wants to</p> <p>15 call it -- email, note -- of November 1st, 2018.</p> <p>16 Q. So on November 1st Marnie said that she</p> <p>17 asked Lisa if something happened in Israel and that</p> <p>18 Lisa said no?</p> <p>19 A. Exactly. "Lisa said no." Three words.</p> <p>20 Exact.</p> <p>21 Q. Did you learn anything else on</p> <p>22 November 1st?</p> <p>23 A. Yes. Lots of things.</p> <p>24 Q. Did you learn that Lisa had accused</p>	<p>---</p> <p>1 no -- eight months after that, recruit two</p> <p>2 more, and they go to you, or you go to them.</p> <p>3 Who knows? But now safety in numbers sort of</p> <p>4 thing. Well, no, no. They should've reported</p> <p>5 this back in the spring when it took place and</p> <p>6 told me, and if it was so difficult, how come</p> <p>7 they could do it in November? What's the</p> <p>8 difference between the spring and the fall?</p> <p>9 So --</p> <p>10 BY MR. CARSON:</p> <p>11 Q. Why don't you answer your own question?</p> <p>12 Can you think of anything?</p> <p>13 A. I am not going to try and interpret their</p> <p>14 minds. All I know is that they waited a long time,</p> <p>15 and they concocted stories for my benefit, and I</p> <p>16 took them at face value, and I took expeditious</p> <p>17 steps to clear up that problem from their lives,</p> <p>18 which I did, and they signed documents saying they</p> <p>19 were content with my [inaudible]. So they have no</p> <p>20 grounds to stand on, you have no grounds to stand</p> <p>21 on, and you should just close this whole damn thing</p> <p>22 down.</p> <p>23 Q. Can you think of any reasons why they</p> <p>24 reported it in November 2018?</p>

Page 173	Page 175
<p>---</p> <p>1 A. You ask them, not me, why they did it.</p> <p>2 Q. Well, you keep saying that they concocted.</p> <p>3 What do you mean by "concocted"? You mean made the</p> <p>4 whole thing up?</p> <p>5 A. They made things up, yes. Lisa told</p> <p>6 Marnie that she had not been hit on by Gregg. I</p> <p>7 learned that November 1st in the morning. That</p> <p>8 afternoon, I went in and Lisa told me she had been</p> <p>9 hit on by Gregg. Excuse me.</p> <p>10 ---</p> <p>11 (Indistinguishable cross-talk.)</p> <p>12 ---</p> <p>13 THE WITNESS: -- she would've come to me</p> <p>14 at the time and told me. She would not have</p> <p>15 waited eight months. I do not believe it, no.</p> <p>16 I acted as though -- I acted on face value. I</p> <p>17 took it very seriously, and I took him out of</p> <p>18 their lives.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Did you read any text messages that Lisa</p> <p>21 sent while she was in Israel?</p> <p>22 A. She showed me her text messages, and none</p> <p>23 of them indicated that he had assaulted her. She</p> <p>24 said she was uncomfortable, et cetera, et cetera,</p>	<p>---</p> <p>1 A. Something along those lines, yes.</p> <p>2 Q. She say that she'll stab him?</p> <p>3 A. She has said that she will stab him, yes.</p> <p>4 She has often said that she wants to kill him and</p> <p>5 stab him. She loathed him.</p> <p>6 Q. She often told you that she wants to kill</p> <p>7 him?</p> <p>8 A. Yeah. She said --</p> <p>9 Q. How often did she say that?</p> <p>10 A. No, no. She didn't tell me. She wrote</p> <p>11 that in her emails, in her texts and so forth.</p> <p>12 Yeah. That's her --</p> <p>13 MR. CARSON: Can you hear? I'm having a</p> <p>14 tough time --</p> <p>15 THE COURT REPORTER: It's tough.</p> <p>16 MR. CARSON: Are you getting it all?</p> <p>17 THE WITNESS: I'm speaking very loud. I'm</p> <p>18 sorry.</p> <p>19 THE COURT REPORTER: Yeah, it's very quiet</p> <p>20 on my end, so please speak up.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. You just have a naturally quiet voice,</p> <p>23 Mr. Pipes. We're not trying to be --</p> <p>24 A. Okay.</p>
Page 174	Page 176
<p>---</p> <p>1 or, at least, that's what the text messages that she</p> <p>2 showed me said. Were they actually sent at the time</p> <p>3 from Israel? I don't know. I did not look at the</p> <p>4 metadata. She just showed me text messages</p> <p>5 allegedly from her to her husband. I took them at</p> <p>6 face value. I did not do an inquiry. I did not ask</p> <p>7 for the metadata or anything like that. I just took</p> <p>8 everything at face value. Though, now, two years</p> <p>9 later, I'm gonna say, show me the metadata. Show me</p> <p>10 [inaudible]. Show me that this actually happened.</p> <p>11 But, in fact, if you look even at what she showed,</p> <p>12 she didn't ever allude to any kind of assault. She</p> <p>13 was weirded out. She was uncomfortable. He was</p> <p>14 talking about this and that, but nothing -- the</p> <p>15 striking thing about her text messages, they don't</p> <p>16 actually refer to his touching her. They don't</p> <p>17 refer to it. So, yeah, clearly, if those text</p> <p>18 messages are valid, she was uneasy in the</p> <p>19 circumstance but --</p> <p>20 Q. Did she say she was scared?</p> <p>21 A. I don't remember the exact words, but,</p> <p>22 yeah, she was uneasy.</p> <p>23 Q. Did she say she wanted to sleep with a</p> <p>24 knife under her pillow?</p>	<p>---</p> <p>1 Q. All right. Let's -- let's take a minute</p> <p>2 and go through some stuff. Okay. Do you see this</p> <p>3 document here I just put in front of you?</p> <p>4 A. Yep.</p> <p>5 Q. Do you remember writing this on 11/2/18?</p> <p>6 A. No.</p> <p>7 Q. Wanna take a minute and read through it</p> <p>8 real quick?</p> <p>9 A. Okay. Okay.</p> <p>10 Q. Do you remember writing it now?</p> <p>11 A. No, I don't remember writing it, but I</p> <p>12 recognize it, yeah.</p> <p>13 Q. So all three women on 11/1/2018 made</p> <p>14 allegations of unwanted sexual advances, correct?</p> <p>15 A. Correct.</p> <p>16 Q. What you said in the letter?</p> <p>17 A. Yep, reporting.</p> <p>18 Q. So on November 1st, 2018 Lisa was one of</p> <p>19 the women who made allegations of unwanted --</p> <p>20 A. Yes, of course.</p> <p>21 Q. -- advances, right?</p> <p>22 A. Yes.</p> <p>23 Q. Because you also said that she said no on</p> <p>24 11/1/18, so I'm just trying to understand.</p>

Page 177	Page 179
<p>--- 1 MR. CAVALIER: Objection. 2 Mischaracterization. 3 THE WITNESS: I did not say that. I said 4 that the handwritten email from Marnie to me 5 that I read early in the morning on 6 November 1st quoted Lisa -- paraphrased Lisa as 7 saying no in answer to the question, did Gregg 8 make advances on you. But, as you can see, I 9 took their testimonies, I confronted Gregg with 10 it, and I dealt with it. You have it all right 11 here in black and white. 12 BY MR. CARSON: 13 Q. Well -- 14 A. -- have in black and white is that they 15 said they were satisfied with this solution. 16 Q. So I haven't seen -- 17 A. -- they came back and said, oh, no, we're 18 not satisfied. We want \$31 million. 19 Q. I haven't seen the email you keep 20 referring to, so I'll ask that you please produce 21 the November 1st, 2018 email from Marnie Meyer where 22 Marnie Meyer writes that Lisa denied being 23 sexually -- being subjected to sexual harassment. 24 A. I can send it to you right now. I don't</p>	<p>--- 1 A. Yeah. 2 Q. So you investigated it in one day? 3 A. Yes. 4 Q. And here is what I found. These women who 5 work for you made unwelcome -- strike that -- say 6 that you made unwanted sexual advances -- I can read 7 this to myself. Hang on a second. So my next 8 question is, Gregg Roman said that he acknowledges 9 his conduct was not acceptable, right? 10 A. Yes. 11 Q. What about his conduct wasn't acceptable? 12 A. Ask them. 13 Q. Well, he said it to you during your 14 investigation, so I'm asking you. 15 A. Ask him. Ask them. I mean, I'm reporter 16 here. I'm not mind reader. 17 Q. Well -- 18 A. Investigator. 19 Q. If he said that his conduct was not 20 acceptable, then why are you trying to say that 21 everything's made up in this case? 22 MR. CAVALIER: Object to form. Object to 23 the mischaracterization. 24 BY MR. CARSON:</p>
Page 178	Page 180
<p>--- 1 know what the protocol is, but I can send it. 2 Q. Well, when we get a break -- I mean, you 3 guys -- can you hear him? I didn't hear what he 4 just said. 5 A. I said I can send it to you. I don't know 6 what the protocols are, but I have it, and I can 7 send it to you. 8 Q. Well, maybe on a break you can -- 9 MR. CAVALIER: Seth, you have the Marnie 10 Meyer note. 11 MR. CARSON: Is that what he's referring 12 to, the handwritten -- 13 MR. CAVALIER: Yes. I believe the 14 handwritten note was put -- was attached to an 15 email that was sent to Daniel. I think that's 16 the discrepancy here. 17 MR. CARSON: If that's what he's referring 18 to, I have it. 19 THE WITNESS: Handwritten note attached to 20 photograph and sent to you by email. 21 BY MR. CARSON: 22 Q. Okay. So it says here -- it says, 23 accordingly, you investigated this matter yesterday 24 immediately upon learning of it. Do you see that?</p>	<p>--- 1 Q. You can answer. 2 A. He acknowledged, broadly speaking, that he 3 made a mistake in having close friendships with his 4 staff, with the people reporting to him. 5 Q. His friendships weren't acceptable? I'm 6 sorry. Go ahead. 7 A. He acknowledged that that was a mistake. 8 He now understands -- he understands for two years 9 now that it's a mistake to have close personal 10 relations with people who you are supervising at 11 work. This is a bad idea. I didn't know about it. 12 I didn't know he was so close to them. I knew he 13 went to lunch with them, but I didn't know he had 14 drinks, and I didn't know he went off to Israel. I 15 didn't know about all these things. When I learned 16 about it, I came down on him and said this is wrong. 17 You made a mistake. And he said, yeah, I made a 18 mistake. 19 Q. Well, he said that his conduct was not 20 acceptable, was what he said, right? 21 A. Yeah. I've just explained to you that 22 having close relations with people you supervise is 23 not acceptable. 24 Q. Why isn't it acceptable, because of the</p>

Page 181

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1 power dynamic?

2 MR. CAVALIER: Object to form.

3 THE WITNESS: It's --

4 BY MR. CARSON:

5 Q. Is that why?

6 A. It's wrong for supervisors to be close to

7 their -- the people they supervise.

8 Q. And why?

9 A. -- maintain -- because it complicates

10 things in all sorts of ways, as we can see right

11 here. Not a good idea. Do what you want on your

12 time. Stay away from close relations with people

13 you supervise.

14 Q. Were you Lisa Barbounis' supervisor at

15 this time?

16 A. I was not.

17 Q. So if Gregg Roman, her supervisor, directs

18 her to do something, and then she doesn't tell you

19 about it, why would you think that she's complicit?

20 A. Why are we going over this again?

21 MR. CAVALIER: Yeah. Object to --

22 THE WITNESS: -- came to me in November.

23 Why didn't she come to me in, let's say, March

24 when the -- I don't remember when it was --

Page 182

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1 let's say March was when the Israel trip was.

2 Why did she not come to me? Why did she hide

3 the whole trip from me? Why did Marnie not

4 tell me about what she was offered to do in

5 Israel? Why did they wait eight months?

6 BY MR. CARSON:

7 Q. Is it possible she was --

8 A. Obviously, they were not scared because

9 they came to me, but they waited eight months.

10 Isn't that a little suspicious, Mr. Carson?

11 Q. No, not at all. Not even a little bit.

12 A. I see. So waiting eight months to come

13 with allegations is perfectly normal and enhances

14 their credibility, does it?

15 Q. Yes.

16 A. Okay.

17 Q. The reason why is because if they were

18 scared of losing their jobs, maybe they felt some

19 sort of safety in numbers by telling you the

20 complaints all at the same time. Did you ever

21 consider that?

22 A. They had numbers. As I pointed out to you

23 previously, Marnie and Lisa knew of each other's

24 offers to go to Israel. They could've come to me.

Page 183

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1 I don't know if AIPAC was before that or after that,

2 but I'm sure they could've found some other reason

3 to -- some other person to come up with a reason.

4 They had numbers. They had two of them, and there

5 was no indication whatsoever that either of them

6 would be fired. That was just a fear they had. No

7 indication. And, for that matter, no indication

8 anytime after that. I didn't fire anybody. I had

9 no hint of firing anybody. I had no intention to

10 fire anyone. I called them my angels and my heroes,

11 and I wanted it to work.

12 Q. Gregg acknowledged that his conduct put

13 these women in a difficult position, correct?

14 A. Yes.

15 Q. So maybe that's the position they put him

16 in is whether or not to -- well, you tell me. What

17 was the difficult position?

18 A. I just explained it to you.

19 Q. Right, agreed. Okay. "You put this in

20 the context of calling yourself a 'social junkie'

21 who seeks constant social interaction." Did he

22 explain what he meant by that?

23 A. I think it's self-evident, isn't it?

24 Q. I do, actually. So are you aware -- have

Page 184

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1 you ever done any research into people who have --

2 who commit serial sexual misconduct?

3 A. I have not. Mr. Carson, I've told you

4 repeatedly I specialize in the Middle East, not

5 these matters. This is your area, not mine.

6 Q. Well, since you have someone like Gregg

7 Roman working for you, do you think maybe you

8 should've done some research like that?

9 MR. CAVALIER: Hey, Seth. Come on, man.

10 I mean, really?

11 MR. CARSON: No. It's a serious question.

12 THE WITNESS: I was approached by three

13 employees with complaints -- far-reaching

14 complaints about all sorts of topics. I

15 investigated and mitigated. I did not do

16 research into their personalities. I did not

17 do psychological research. I did not do legal

18 research. I did research into what is going

19 on, and I mitigated it to their satisfaction.

20 I don't see why you are suggesting that I

21 should also have gone into all sorts of arcane

22 research about psychology. No. I dealt with

23 the problem in front of me. I'm a Middle East

24 specialist. I'm the head of an organization.



Page 185	Page 187
<p>---</p> <p>1 I deal with problems when they arise. I did 2 that here. I spent a week on it. I mitigated 3 it to everyone's contentment. What more do you 4 want?</p> <p>5 BY MR. CARSON:</p> <p>6 Q. I wasn't suggesting that you seek out 7 arcane psychological research, but maybe current 8 psychological research, maybe talk to an expert. 9 Did you ever consider doing that?</p> <p>10 MR. CAVALIER: Object to form.</p> <p>11 THE WITNESS: I did not need to talk to an 12 expert. I needed to talk to the individuals 13 who come to me and complain and listen to them 14 carefully and figure out a solution.</p> <p>15 BY MR. CARSON:</p> <p>16 Q. Well, based on some of the complaints that 17 we heard today, it does appear Mr. Roman has an MO, 18 doesn't it?</p> <p>19 MR. CAVALIER: Object to form.</p> <p>20 THE WITNESS: I know nothing about 21 Mr. Roman's private life.</p> <p>22 BY MR. CARSON:</p> <p>23 Q. Isn't it your job to know something about 24 it?</p>	<p>---</p> <p>1 organization. That's what I do, and I deal 2 with the problem, and I move on, and I think 3 this is a perfect example of dealing with a 4 problem and moving on.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. Well, I do, too, Mr. Pipes.</p> <p>7 A. Thank you.</p> <p>8 Q. The moving on part is the problem, though, 9 right? You moved on before the issues were actually 10 dealt with, correct?</p> <p>11 A. No. I dealt with all the issues. All 12 four of the principals in this issue were content 13 with the resolution I came up with. And, if you 14 don't know it, I have signed documents by all four 15 of them to that effect. Yes, they didn't like one 16 or another aspect of it, but they signed it and 17 moved on. There were no complaints, not a single 18 complaint. If there had been, I would've acted on 19 it.</p> <p>20 Q. Other than November 2018?</p> <p>21 A. After the beginning of November. It was 22 all consolidated in this one week. Nothing before, 23 and nothing after.</p> <p>24 Q. You definitely made that clear today. So</p>
Page 186	Page 188
<p>---</p> <p>1 MR. CAVALIER: Object --</p> <p>2 THE WITNESS: It is not my job to know 3 about Mr. Roman's or any other employee's 4 private life. I am only concerned if what they 5 do affects the Middle East Forum. So we had 6 another instance of that, I might remind you, 7 where Lisa Barbounis was going off to Britain, 8 and she was engaged in activities which are 9 harmful to the Middle East Forum. She can go 10 where she wants and do what she wants, but she 11 can't engage in activities which are harmful to 12 us, and so I protested them repeatedly. So 13 whenever -- whether it be Gregg or Lisa or 14 anyone else engages in activity which I deem 15 harmful, particularly in conjunction with Marc 16 on a legal basis, harmful to what we -- our 17 work, I will bring it up. But if it's not 18 harmful, Lisa can do what she wants. If it's 19 not harmful, Gregg can do what he wants. I am 20 not their den mother. I'm the head of an 21 organization. I'm concerned about the efficacy 22 and credibility of the organization. I have to 23 raise funds for the organization. I'm 24 responsible for the employees of the</p>	<p>---</p> <p>1 you never had another credible unwanted allegation 2 of sexual advances by Mr. Roman to a female staffer? 3 See this sentence here? I can ask a better 4 question. You write here that you acknowledge 5 that -- you're telling Gregg that he acknowledges 6 that, in the future, if there's another credible 7 unwanted sexual advance --</p> <p>8 A. It doesn't say --</p> <p>9 ---</p> <p>10 (Indistinguishable cross-talk.)</p> <p>11 ---</p> <p>12 THE WITNESS: A credible. Not another 13 credible. A credible.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. I'm sorry. Say that again, Mr. Pipes.</p> <p>16 A. You misread that. You said another 17 credible unwanted sexual advance, implying that I 18 accepted the accusations against him were credible. 19 I didn't write that. I wrote, if there is a future 20 case of a credible unwanted sexual advance, then I 21 will fire you, but I didn't imply that -- I took 22 seriously that I believed them. I took them 23 seriously, but it's a fine line. I took it 24 seriously and acted upon these complaints, but I did</p>

Page 189	Page 191
<p>1 not actually believe them.</p> <p>2 Q. You never believed them, correct?</p> <p>3 A. No. Well, I mean, what is there to</p> <p>4 believe about a sexual advance when a woman says to</p> <p>5 a man, I'm not gonna sleep with you? That is not</p> <p>6 exactly...</p> <p>7 Q. Mr. Pipes, what about that she felt the</p> <p>8 need to point that out, though?</p> <p>9 A. Well, that's not our case here, is it?</p> <p>10 Q. So Mr. Pipes agreed to the -- strike that.</p> <p>11 So Mr. Roman agreed to the new structure governing</p> <p>12 the employee, the employment relationship between</p> <p>13 Mr. Roman and the female staffers, right?</p> <p>14 A. Yes. You have, I'm sure, the agreement</p> <p>15 between -- signed agreement between Gregg and me.</p> <p>16 Q. It looks like this is an email from</p> <p>17 Ms. McNulty, and it's addressed to you, and Marc</p> <p>18 Fink is cc'd on it, and I think she's actually</p> <p>19 responding to an email that you wrote her. So you</p> <p>20 see on Sunday, November 4th at -- strike that. On</p> <p>21 Sunday, November 4th, 2018 at 11:34 p.m., you sent</p> <p>22 an email with the subject line, "Allegations and</p> <p>23 consequences," correct?</p> <p>24 A. Correct, except it's a.m., not p.m.</p>	<p>1 about it.</p> <p>2 Q. You might be a faster reader than me. Are</p> <p>3 you --</p> <p>4 A. "On November 1st, I confirmed with you</p> <p>5 that I was aware of certain indiscretions between"</p> <p>6 -- da, da, da, da -- "during a trip to Israel in</p> <p>7 May."</p> <p>8 Q. Take a minute and just read it to</p> <p>9 yourself, and tell me when you're ready.</p> <p>10 A. Okay.</p> <p>11 MR. CAVALIER: Seth, if you got a natural</p> <p>12 break point coming up, it's almost --</p> <p>13 MR. CARSON: Wanna do it now? You wanna</p> <p>14 just do it now?</p> <p>15 MR. CAVALIER: -- 2:15. We can if you</p> <p>16 want to. I'm just thinking maybe we break for</p> <p>17 a half hour for lunch.</p> <p>18 MR. CARSON: Yeah. We can just do it now,</p> <p>19 whatever. We'll do this document when we get</p> <p>20 back.</p> <p>21 MR. CAVALIER: That works for me. You</p> <p>22 okay with that, Daniel?</p> <p>23 THE WITNESS: Yeah.</p> <p>24 THE VIDEOGRAPHER: All right. So it is</p>
Page 190	Page 192
<p>1 Q. Thank you -- a.m. -- and you sent -- you</p> <p>2 copied and pasted and sent this exact email to</p> <p>3 Ms. McNulty, Ms. Meyer, and Ms. Barbounis, correct?</p> <p>4 A. Correct.</p> <p>5 Q. And you -- I mean, I can show them to you,</p> <p>6 but I'll represent to you you sent all three of them</p> <p>7 at 11:34 a.m. on November 4th. Do you remember</p> <p>8 that?</p> <p>9 A. Yep. I don't know if I remember, but,</p> <p>10 yeah, I see it.</p> <p>11 Q. And I think that later the same day --</p> <p>12 that evening, Ms. McNulty replied.</p> <p>13 A. Mm-hmm. Well, thank you for pointing this</p> <p>14 out because it shows that she, too, is complicit --</p> <p>15 ---</p> <p>16 (Indistinguishable cross-talk.)</p> <p>17 ---</p> <p>18 THE WITNESS: She also was aware of it, so</p> <p>19 all three were complicit.</p> <p>20 BY MR. CARSON:</p> <p>21 Q. Wait. What are we talking about now?</p> <p>22 What are they complicit in?</p> <p>23 A. Hiding the trip to Israel and not saying</p> <p>24 anything -- one, hiding it, and, two, not telling me</p>	<p>1 2:10 p.m., and we are off the record.</p> <p>2 ---</p> <p>3 (Whereupon there was a recess in the</p> <p>4 proceeding from 2:10 p.m. to 2:49 p.m.)</p> <p>5 ---</p> <p>6 THE VIDEOGRAPHER: The time is 2:49 p.m.</p> <p>7 Eastern Time, and we are on the record.</p> <p>8 BY MR. CARSON:</p> <p>9 Q. All right. Let's do it. Do it to it.</p> <p>10 All right. So we left off, we were looking at this</p> <p>11 document, which looks like an email -- like we said</p> <p>12 before, it's an email. You sent this email to</p> <p>13 Tricia in the morning, and then she replied. Just</p> <p>14 tell me whenever you're ready.</p> <p>15 A. Ready. I am ready.</p> <p>16 Q. So today you testified that the only thing</p> <p>17 that was reported to you by Patricia McNulty was</p> <p>18 that Gregg sat too close to her on the couch. Do</p> <p>19 you remember that?</p> <p>20 A. Yep.</p> <p>21 Q. So this email seems to describe a much</p> <p>22 more significant incident. Don't you agree?</p> <p>23 A. Well, this is the next day.</p> <p>24 Q. Sorry?</p>

Page 193	Page 195
<p>1 A. This is the next day. This is not what 2 she told me in her office. "Gregg put his arm 3 around Lisa and myself and pulled me into him." 4 Yeah, that is different from her initial testimony. 5 Q. Initial what? 6 A. It's different from her initial statement 7 to me. 8 Q. Did you read this? 9 A. I read it, yeah. It's not what she told 10 me on the first -- first time we spoke. 11 Q. I mean, what she describes is that he 12 abruptly asked the three men to leave. "At that 13 point, as the men were trying to wrap up the 14 conversation with Matt, Gregg put his arm around 15 Lisa and myself and pulled me into him so that I was 16 almost in his lap and began whispering in my ear 17 that no other men should be in the room." 18 A. Yep. I see it. That's not what she told 19 me the day before. 20 Q. Yeah, and her complaint alleges that he 21 put his hand underneath her to make that move. 22 A. Right, so she added the first round here 23 and the second round about the hand under her. 24 Q. Oh, so these are -- she's lying, right?</p>	<p>1 MR. CARSON: We're gonna wait for an 2 answer. 3 MR. CAVALIER: Then we're gonna be waiting 4 a long time. 5 MR. CARSON: Fine. Go off the record 6 while we wait. 7 MR. CAVALIER: I disagree. Ask your next 8 question or call the judge. You wanna call 9 Judge Wolson and tell him you want Daniel 10 Pipes, the president of the Middle East Forum, 11 to answer the question about where a woman's 12 vagina is? 13 MR. CARSON: Yeah, because it's 14 relevant -- 15 --- 16 (Indistinguishable cross-talk.) 17 --- 18 MR. CARSON: Jon, sorry, but it's relevant 19 to the case. The director of the Middle East 20 Forum put his hand underneath my client's butt 21 right next to her vagina, so it's relevant. 22 MR. CAVALIER: You can ask the next 23 question, or you can call the judge. 24 BY MR. CARSON:</p>
Page 194	Page 196
<p>1 A. She's inconsistent. I don't know what the 2 truth is. I wasn't there, but it's inconsistent. 3 Q. Do you know -- 4 A. Also point out to you that -- No. 1 below, 5 because I witnessed his -- da, da, da, da, da -- 6 nature, I worry more -- I -- well, she worries more 7 about his vindictive, manipulative, and volatile 8 nature more than sexual advances. So the sexual 9 advances were always secondary matter. It was the 10 management of his team that she was unhappy about 11 and everyone was unhappy about and I was unhappy 12 about. Yeah. 13 Q. Do you know where a woman's vagina is? 14 MR. CAVALIER: Hold on. Really? 15 MR. CARSON: Yes. Do you know where a -- 16 MR. CAVALIER: Don't answer that, Daniel. 17 --- 18 (Indistinguishable cross-talk.) 19 --- 20 MR. CARSON: You're not cutting anything 21 off, so stop threatening, and, second, he has 22 to answer the question. 23 MR. CAVALIER: No, he doesn't. Don't 24 answer the question.</p>	<p>1 Q. You do understand that a woman's vagina is 2 underneath her, right? Underneath her, right next 3 to her butt? 4 MR. CAVALIER: Same objection, same 5 instruction. 6 MR. CARSON: We're gonna call the judge if 7 I can't ask questions about this. 8 MR. CAVALIER: Call the judge, please. 9 Call Judge Wolson and tell him that you're 10 asking these questions. I -- 11 MR. CARSON: They're good questions, Jon. 12 MR. CAVALIER: Then call the judge. 13 MR. CARSON: He's gonna be instructed to 14 answer. 15 MR. CAVALIER: Call the judge. 16 BY MR. CARSON: 17 Q. You do know that, right, Mr. Pipes? 18 MR. CAVALIER: Ask legitimate questions of 19 this witness -- 20 BY MR. CARSON: 21 Q. You do know that, right? So you 22 understand why it might be a sensitive subject for 23 her to describe what Mr. Roman did to her, right? 24 You understand that?</p>

Page 197	Page 199
<p>1 MR. CAVALIER: You can answer that</p> <p>2 question, Daniel.</p> <p>3 THE WITNESS: Ask it again.</p> <p>4 MR. CARSON: You can read back my</p> <p>5 question.</p> <p>6 ---</p> <p>7 (Whereupon the court reporter read back</p> <p>8 the pertinent testimony.)</p> <p>9 ---</p> <p>10 THE WITNESS: Yes. It's a sensitive</p> <p>11 subject, and it was sensitive in April, and it</p> <p>12 was sensitive in November, and there's no</p> <p>13 reason in my mind that she should bring it up</p> <p>14 only, what, seven months later.</p> <p>15 BY MR. CARSON:</p> <p>16 Q. Brought it up because she was asking you</p> <p>17 for help, right?</p> <p>18 A. Yeah.</p> <p>19 Q. And you didn't help her, did you?</p> <p>20 A. Of course I did. I --</p> <p>21 Q. What did you do, Mr. Pipes?</p> <p>22 A. Removed Gregg from her life.</p> <p>23 Q. Forever?</p> <p>24 A. Until she was happy to have him back.</p>	<p>1 A. I don't know. Show me.</p> <p>2 Q. You asked her for a written statement, no?</p> <p>3 A. Show me. Show me --</p> <p>4 Q. Sure, I'd be happy to show you. I mean,</p> <p>5 do you remember asking her for a written statement?</p> <p>6 A. I do not remember notes I sent two years</p> <p>7 ago. You have to show them to me. I see no request</p> <p>8 for more information. I see three questions. None</p> <p>9 of them inquire about -- ask for more information.</p> <p>10 She offered it.</p> <p>11 Q. You never asked her to provide more</p> <p>12 information?</p> <p>13 A. Not in this letter.</p> <p>14 Q. Did you ever ask her in any other letters?</p> <p>15 A. I went around the day before and I</p> <p>16 inquired, what's going on? Tell me everything, and</p> <p>17 she told me that he was too close to her on the</p> <p>18 couch. That was it. I remember that distinctly.</p> <p>19 This increased the complaint, and your imaginary</p> <p>20 complaint increased it further, that he put his hand</p> <p>21 under her, I think. That wasn't here, and it</p> <p>22 certainly wasn't the first day. So she elaborated</p> <p>23 on it. What the truth is, I don't know. I just</p> <p>24 know that having three different versions of the</p>
Page 198	Page 200
<p>1 Q. She was happy to have him back throughout</p> <p>2 the entire time after he came back?</p> <p>3 A. And when the issue came up in March 9th,</p> <p>4 she said, I have no problems with Gregg.</p> <p>5 Q. Did she ever complain?</p> <p>6 A. No.</p> <p>7 Q. Never?</p> <p>8 A. Not after this, and not before this. This</p> <p>9 was the one time.</p> <p>10 Q. Okay.</p> <p>11 A. And I will point out that her note says</p> <p>12 that she's more worried about his personality,</p> <p>13 manipulative and so forth, than about sexual</p> <p>14 advances. This was not the issue. It was put</p> <p>15 aside.</p> <p>16 Q. But you were wrong when you said that she</p> <p>17 only said that Gregg Roman was close to her on the</p> <p>18 couch, right? That was wrong?</p> <p>19 A. I'm not wrong. I'm reporting to you what</p> <p>20 I was told by her on November 1st. The first</p> <p>21 escalation was November 2nd, and the second came in</p> <p>22 your imaginary complaints.</p> <p>23 Q. You asked her for a more detailed report,</p> <p>24 correct?</p>	<p>1 same thing makes me skeptical.</p> <p>2 Q. You don't know what the truth is, right?</p> <p>3 A. Of course I don't, but I see three</p> <p>4 different versions of it. I can read two, and the</p> <p>5 third one I remember.</p> <p>6 Q. Why don't you try reading this sentence</p> <p>7 here, Mr. Pipes?</p> <p>8 A. I didn't ask for more, just what you told</p> <p>9 me already, and she elaborated on what she told me</p> <p>10 the day before.</p> <p>11 Q. Did you ask her about the elaboration?</p> <p>12 A. No, I did not. I did not go into --</p> <p>13 Q. Did you ask her any other questions after</p> <p>14 that?</p> <p>15 A. You're interrupting me.</p> <p>16 MR. CAVALIER: Gonna let him answer?</p> <p>17 THE WITNESS: I did not go into any --</p> <p>18 MR. CARSON: He answered. He said, no, I</p> <p>19 did not.</p> <p>20 BY MR. CARSON:</p> <p>21 Q. Did you ask him about any other questions</p> <p>22 after that?</p> <p>23 A. I took at face value the complaints</p> <p>24 against Gregg, I noted them, and I acted upon them.</p>



Page 201	Page 203
<p>1 Q. You still take them at face value?</p> <p>2 A. I took them at face value then. I have</p> <p>3 learned a lot since then. I didn't know that</p> <p>4 there'd be a third round where she would claim that</p> <p>5 he put his hand under her at this time.</p> <p>6 Q. Well, how do you think he pulled her onto</p> <p>7 her?</p> <p>8 A. You're interrupting me again.</p> <p>9 Q. How do you think he pulled her onto her?</p> <p>10 A. Could I finish --</p> <p>11 Q. Answer both questions at the same time.</p> <p>12 A. No. I'll finish one, and then you will</p> <p>13 proceed.</p> <p>14 Q. Do it in the order you wanna do it,</p> <p>15 Mr. Pipes.</p> <p>16 A. I've lost my train of thought. Could I</p> <p>17 ask the court reporter from where I was?</p> <p>18 ---</p> <p>19 (Whereupon the court reporter read back</p> <p>20 the pertinent testimony.)</p> <p>21 ---</p> <p>22 THE WITNESS: I have learned a great deal</p> <p>23 about these complaints in the two years since.</p> <p>24 I've been made aware of all sorts of</p>	<p>1 THE WITNESS: And that they were ginned</p> <p>2 up --</p> <p>3 BY MR. CARSON:</p> <p>4 Q. I asked you a yes or no question,</p> <p>5 Mr. Pipes.</p> <p>6 A. I am allowed to answer as I wish, I</p> <p>7 believe; am I not?</p> <p>8 Q. Actually, not true, but go ahead. You can</p> <p>9 finish your response. It was a yes or no question.</p> <p>10 A. What is your question?</p> <p>11 Q. I said, today, you know that they're</p> <p>12 false?</p> <p>13 A. Yes.</p> <p>14 Q. So you do know what happened then?</p> <p>15 A. I know it didn't happen.</p> <p>16 Q. What didn't happen?</p> <p>17 A. What these inconsistent, variable</p> <p>18 accusations claim happened.</p> <p>19 Q. So Gregg Roman never pulled Tricia onto</p> <p>20 his lap?</p> <p>21 A. I don't know.</p> <p>22 Q. That never happened?</p> <p>23 A. I know that she gave three different</p> <p>24 accounts of it, and I find that implausible.</p>
Page 202	Page 204
<p>1 interactions. I can't give you chapter and</p> <p>2 verse, but I've become aware of a far more</p> <p>3 elaborate ruse than I was aware of at the time.</p> <p>4 I just took it at face value at the time. Now,</p> <p>5 no, I do not. Now I'm highly skeptical.</p> <p>6 BY MR. CARSON:</p> <p>7 Q. You've learned that Gregg Roman is a</p> <p>8 sexual predator, correct?</p> <p>9 MR. CAVALIER: Object to form.</p> <p>10 THE WITNESS: I've learned that the</p> <p>11 accusations against him are false.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. I thought you just said you don't know if</p> <p>14 they're false.</p> <p>15 A. I didn't know then. I just took it at</p> <p>16 face value in early November 2018.</p> <p>17 Q. So now you know they're false?</p> <p>18 A. Move ahead to November 2020, and I have</p> <p>19 had a lot more information. I have looked at it far</p> <p>20 more in detail, and I came to the conclusion these</p> <p>21 are false and --</p> <p>22 Q. So you know what happened?</p> <p>23 A. Let me finish --</p> <p>24 MR. CAVALIER: Let him finish his answer.</p>	<p>1 Q. None of the counts contradict each other,</p> <p>2 Mr. Pipes, do they?</p> <p>3 A. They do.</p> <p>4 Q. How? Tell me the contradictions.</p> <p>5 A. The first time was that he was just too</p> <p>6 close to her, which I found odd. That's why I</p> <p>7 remember it so clearly. Too close to her?</p> <p>8 That's -- in a room full of people on, apparently,</p> <p>9 couch full of people? Okay. You say so. I</p> <p>10 didn't -- I didn't argue with her. I just took it,</p> <p>11 and I removed him from her life, or at least almost</p> <p>12 entirely from her life, so she had only a few</p> <p>13 electronic communications with [inaudible].</p> <p>14 Q. Mr. Pipes, how is that a contradiction?</p> <p>15 If he pulled her onto his lap, wouldn't that be too</p> <p>16 close?</p> <p>17 A. No. That would be different.</p> <p>18 Q. It's not too close if he pulls her onto</p> <p>19 his lap? That's okay?</p> <p>20 A. No. I didn't say it's okay. I said it's</p> <p>21 a different complaint. She --</p> <p>22 Q. But it's not a contradiction, is it?</p> <p>23 A. She mentioned nothing about pulling him to</p> <p>24 her on her lap, and she mentioned nothing about</p>

Page 205	Page 207
<p>1 putting his hand under her in the initial statement 2 she made to me. 3 Q. And if he wrapped his hand around her and 4 pulled her onto his lap by using her backside, 5 that's not a contradiction either, right? There's 6 never been a contradiction in Ms. McNulty's 7 statements, has there? 8 A. An inconsistency. 9 --- 10 (Indistinguishable cross-talk.) 11 --- 12 THE COURT REPORTER: One at a time, guys. 13 THE WITNESS: It is a very substantial 14 inconsistency that puts her statements into 15 doubt in my mind. 16 BY MR. CARSON: 17 Q. There's never been a single 18 inconsistency -- 19 MR. CAVALIER: Objection. Asked and 20 answered. Daniel, you've answered this 21 already. Seth, move on. 22 BY MR. CARSON: 23 Q. Right? 24 A. Right what?</p>	<p>1 A. Lisa was on the other side and couldn't 2 see. She has made that clear. 3 Q. Has she made that clear? Were you at her 4 deposition the other day? 5 A. I was. 6 Q. So you heard her testimony that she was 7 looking right at him, correct? 8 A. I believe -- 9 MR. CAVALIER: Object to the 10 categorization and description. 11 MR. CARSON: I'm describing my client's 12 testimony at her deposition. 13 --- 14 (Indistinguishable cross-talk.) 15 --- 16 THE WITNESS: -- where Gregg's hand was. 17 BY MR. CARSON: 18 Q. So you've heard Lisa swear under oath that 19 she watched him pull Patricia onto his lap, correct? 20 MR. CAVALIER: Object to form. 21 THE COURT REPORTER: What was the answer? 22 THE WITNESS: Yes. 23 BY MR. CARSON: 24 Q. You heard him, right? You heard her</p>
Page 206	Page 208
<p>1 Q. There's never been a single inconsistency, 2 has there? 3 A. I've just pointed out two inconsist -- 4 three inconsistencies. 5 Q. How? What are they? 6 MR. CAVALIER: Objection. Asked and 7 answered. 8 THE WITNESS: First one was that he was 9 just too close; second one was that he pulled 10 her onto his lap; third one was he put his hand 11 under her as well as the first two. 12 BY MR. CARSON: 13 Q. So according to you, because of those, it 14 never happened, right? 15 A. I didn't say that. I said her testimony 16 is not credible with me because she has changed her 17 testimony over time. 18 Q. You don't like -- strike that. You 19 weren't there, were you? 20 A. No, I wasn't. 21 Q. So you don't know whether this happened, 22 do you? 23 A. I have no idea what happened. 24 Q. Did Lisa corroborate it?</p>	<p>1 testify to that, correct? 2 A. Yup. 3 Q. She also corroborated to you at the time, 4 right, back in November? 5 A. Who? 6 Q. Lisa. 7 A. I don't remember. Show me. 8 Q. Well, wouldn't she have been a witness 9 that you could've talked to about this incident? 10 A. I spoke to Tricia about Tricia, Lisa about 11 Lisa, and Marnie about Marnie. 12 Q. So you didn't care about talking about -- 13 getting witness statements? 14 MR. CAVALIER: Object to form. 15 THE WITNESS: I asked -- 16 BY MR. CARSON: 17 Q. Did you care about getting witness 18 statements? 19 MR. CAVALIER: Seth, listen. You're not 20 on television. You're not in front of a jury. 21 If you wanna ask questions, let him answer the 22 questions. 23 BY MR. CARSON: 24 Q. Did you care about getting witness</p>

Page 209	Page 211
<p>1 statements?  2 A. I got witness statements.  3 Q. I thought you just said you talked to --  4 ---  5 (Indistinguishable cross-talk.)  6 ---  7 THE COURT REPORTER: Guys, just so you  8 know, every time there's an interruption, it's  9 gonna be a very unclear record.  10 MR. CAVALIER: I mean, this whole  11 thing's --  12 THE WITNESS: I cared about witness  13 statements, and I collected witness statements.  14 I did not ask each about the other. I asked  15 each about herself and herself alone, and it  16 wasn't just the sexual topic; it was the whole  17 range of displeasure with Gregg's behavior as a  18 manager, and I took this all in, I took notes  19 on it, which I may or may not have, and I --  20 BY MR. CARSON:  21 Q. You gotta speak up.  22 A. I investigated it, and I mitigated it, and  23 everybody was satisfied with it. So why are we  24 talking about it now?</p>	<p>1 them up.  2 Q. So you --  3 A. Let me finish. I didn't inquire. I took  4 it at face value that these were text messages that  5 she sent at that time, in that place, made no  6 inquiry. I took all three of their statements at  7 face value and took drastic, radical action to  8 mediate their problems, and they were content with  9 it. And I ask again, why are we here discussing  10 this when everybody was happy with it, and nobody  11 had a complaint after that? What grounds are there  12 to be discontent? They said -- and look at this  13 very note that you point out to me from Tricia that  14 says that the least of my -- more or less, my main  15 problem is not sexual harassment and sexual things.  16 It's other things. Gregg's being a bad --  17 ---  18 (Indistinguishable cross-talk.)  19 ---  20 THE WITNESS: That was the gist of it.  21 Yes, there was a sexual component. It was  22 minor. It was put aside. Look at Stacey  23 Roman's notes on the meeting on the 5th of  24 November. It was all about this and that and</p>
Page 210	Page 212
<p>1 Q. So you didn't try to corroborate any of  2 the allegations that any of these women made? Is  3 that your testimony?  4 A. I took their allegations at face value and  5 acted upon them.  6 Q. So trying to get to the bottom of it and  7 find out if these things really happened wasn't  8 really a concern of yours, was it?  9 MR. CAVALIER: Object to form.  10 THE WITNESS: I took their allegations at  11 face value and did --  12 BY MR. CARSON:  13 Q. Don't you wanna know if Gregg did it?  14 MR. CAVALIER: Seth, how many times you  15 gonna interrupt the guy?  16 MR. CARSON: He answered my question.  17 BY MR. CARSON:  18 Q. Don't you wanna know if Gregg did it?  19 A. I took at face value that he did it. I  20 listened to them, and I acted upon it. I did not  21 engage in a forensic investigation into it beyond  22 that. I did not, for example, look at Lisa's text  23 messages in context. I just looked at them on her  24 phone, and she showed me. Now, she could've made</p>	<p>1 the other. Not a word about sexual --  2 BY MR. CARSON:  3 Q. I asked you a yes or no question.  4 A. All right, and I can answer as I wish.  5 Q. So -- but you can't just talk for five to  6 ten minutes without --  7 A. I believe I can, and I will do so if I  8 want to.  9 Q. Actually, you're not going to. So -- so  10 Mr. Pipes, your -- the way you reacted to these  11 allegations, you reacted as if all of them were  12 true? Is that your testimony, yes or no?  13 A. I reacted to them, yes.  14 Q. So if Gregg Roman stuck his foot up Lisa's  15 ass, and if Gregg Roman had sex with an 18-year-old  16 intern and lured her to his room to get something  17 signed in the course and scope of his position as  18 director, and if Gregg Roman put his hand under  19 Patricia's butt and dragged her onto his lap and  20 started whispering inappropriate things in her ear,  21 your response was to let him maintain his  22 directorship?  23 MR. CAVALIER: Object to form across the  24 board.</p>

Page 213	Page 215
<p>---</p> <p>1 MR. CARSON: Your objection's noted.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. You can answer.</p> <p>4 A. Lea Merville is not at issue here.</p> <p>5 Q. Yeah, I know. She wasn't an issue for you</p> <p>6 ever, right?</p> <p>7 A. No. She never came to me.</p> <p>8 Q. You never did anything about Lea -- the</p> <p>9 issues that dealt with -- that pertained to Lea</p> <p>10 Merville, correct?</p> <p>11 A. I never did. She never came to me.</p> <p>12 Q. It never did --</p> <p>13 A. -- true and what's not true. I don't know</p> <p>14 what her views are. I don't know if she -- anything</p> <p>15 happened. I don't know if she want it to happen. I</p> <p>16 know nothing.</p> <p>17 Q. Could you have called her?</p> <p>18 A. Not my business. I had three employees</p> <p>19 who were unhappy and put matters aforth [sic] --</p> <p>20 without the sex part -- four employees who were</p> <p>21 unhappy, and I had to deal with it.</p> <p>22 Q. Did you just say it's not your business?</p> <p>23 A. What relations Gregg has with others who</p> <p>24 don't protest to me, no, it's not my business.</p>	<p>---</p> <p>1 hypothetical --</p> <p>2 BY MR. CARSON:</p> <p>3 Q. That's not your business?</p> <p>4 MR. CAVALIER: You can answer if you can.</p> <p>5 THE WITNESS: If Lisa Barbounis goes to a</p> <p>6 member of the MEF staff and lures her to his --</p> <p>7 to her room for sex, it's also not my business.</p> <p>8 Yeah, these are not my business.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. So you're comparing consensual sex -- Lisa</p> <p>11 Barbounis' decision to have consensual sex with</p> <p>12 someone to quid pro quo sexual harassment? That's</p> <p>13 your --</p> <p>14 MR. CAVALIER: Object to form, and object</p> <p>15 to the mischaracterization of --</p> <p>16 BY MR. CARSON:</p> <p>17 Q. Are you comparing those two things?</p> <p>18 A. No.</p> <p>19 Q. Then why do you keep saying that,</p> <p>20 Mr. Pipes? What does Lisa Barbounis' decision to</p> <p>21 have sex with someone have to do with anything in</p> <p>22 this case?</p> <p>23 A. These are both actions -- sexual actions</p> <p>24 that people doing on their own private time, and no</p>
Page 214	Page 216
<p>---</p> <p>1 Q. So it only becomes your business if</p> <p>2 someone complains to you directly? Is that your</p> <p>3 testimony?</p> <p>4 MR. CAVALIER: Object to form.</p> <p>5 THE WITNESS: There could be other</p> <p>6 conditions, but what we're talking about now is</p> <p>7 three employees who came to me with specific</p> <p>8 allegations, and I dealt with them.</p> <p>9 ---</p> <p>10 (Indistinguishable cross-talk.)</p> <p>11 ---</p> <p>12 THE WITNESS: I have now, since then,</p> <p>13 engaged in lawsuits that seem to pretend that I</p> <p>14 didn't deal with them.</p> <p>15 BY MR. CARSON:</p> <p>16 Q. So if Gregg Roman entices a 18-year-old</p> <p>17 intern to a hotel room and says, you'll come to my</p> <p>18 hotel room if -- and I'll sign your document, that's</p> <p>19 not your business?</p> <p>20 MR. CAVALIER: Object to form. Object to</p> <p>21 lack of foundation --</p> <p>22 BY MR. CARSON:</p> <p>23 Q. That's not your business?</p> <p>24 MR. CAVALIER: -- incomplete</p>	<p>---</p> <p>1 one has come to me to complain about it, and,</p> <p>2 therefore, it's not my business. I am --</p> <p>3 Q. So you're only responsible --</p> <p>4 A. Let me finish.</p> <p>5 Q. You just --</p> <p>6 A. Let me finish.</p> <p>7 Q. Go ahead, Mr. Pipes. Finish your answer.</p> <p>8 A. I am president of the Middle East Forum.</p> <p>9 I am not their chaperones.</p> <p>10 Q. You're not their den mother, right?</p> <p>11 A. I'm not their den mother. Thank you. I</p> <p>12 am not concerned unless someone comes to me -- I</p> <p>13 have a big job. I have to raise money. I have to</p> <p>14 engage in scholarship. I have to oversee the</p> <p>15 institution, and I do not go inquire of people, how</p> <p>16 are you feeling today? Any problems? No. They</p> <p>17 come to me. I made it clear from the beginning. No</p> <p>18 surprises, open door, come to me. Any problems,</p> <p>19 come to me, and they came to me and --</p> <p>20 Q. If they don't come to you, it's not your</p> <p>21 business?</p> <p>22 A. Right. What am I -- I don't delve into</p> <p>23 their private lives.</p> <p>24 Q. It's not your problem?</p>



Page 217	Page 219
<p>---</p> <p>1 A. It's not --</p> <p>2 Q. Right?</p> <p>3 A. -- something I know about.</p> <p>4 Q. You're too important of a person?</p> <p>5 MR. CAVALIER: Object.</p> <p>6 THE WITNESS: I have a job. My job is to</p> <p>7 pay close attention to my employees if they</p> <p>8 have a problem.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. Whose job it is [sic] to make sure that</p> <p>11 Gregg Roman doesn't violate the rights of women who</p> <p>12 work for the Middle East Forum? Isn't that your</p> <p>13 job, too, Mr. Pipes?</p> <p>14 A. My job is to be concerned with the welfare</p> <p>15 of my employees, whatever gender they may be and</p> <p>16 whatever their issues may be, and I take concern. I</p> <p>17 think you have Exhibit A in front of you. When I</p> <p>18 was presented with a problem, I dealt with it</p> <p>19 expeditiously and successfully. The issue was</p> <p>20 closed until certain people wandered in and raised</p> <p>21 it and asked for \$31 million.</p> <p>22 Q. You would characterize the way you handled</p> <p>23 this as successful?</p> <p>24 A. I certainly would.</p>	<p>---</p> <p>1 Q. Did you think these situations warranted a</p> <p>2 personal response?</p> <p>3 A. Yes.</p> <p>4 Q. So why did you send them the exact same</p> <p>5 email? You sent Marnie the same email, too. Why?</p> <p>6 A. Because I wanted to have a single</p> <p>7 arrangement with everyone, and everyone was content</p> <p>8 with it. There were no special circumstances for</p> <p>9 one or the other person.</p> <p>10 Q. Shouldn't there have been special</p> <p>11 circumstances since each one of them was alleging</p> <p>12 special conduct -- different conduct?</p> <p>13 A. No.</p> <p>14 Q. No, okay. So Ms. Barbounis tells you that</p> <p>15 she's not at all happy with Mr. Roman's response to</p> <p>16 the allegations, correct?</p> <p>17 A. I have to read it. I note his</p> <p>18 inappropriate behavior is the least of my concerns.</p> <p>19 More troubling is the deceit and abusive behavior I</p> <p>20 witness and experience on a weekly basis, which</p> <p>21 increased after the Israel incident. And this is,</p> <p>22 rather, what Tricia said -- least of her concerns,</p> <p>23 that this was a minor matter -- and then they go on</p> <p>24 about all the bad things that Gregg did as a</p>
Page 218	Page 220
<p>---</p> <p>1 Q. Sitting here today?</p> <p>2 A. Yes, very successful. I have --</p> <p>3 Q. I applaud your honesty.</p> <p>4 A. -- four written -- signed documents</p> <p>5 saying, go ahead, I'm content. You have them right</p> <p>6 here in front of you. They all signed --</p> <p>7 Q. Mr. Pipes, I'm gonna direct your attention</p> <p>8 to another exhibit. It's marked 0005 to 6. Let's</p> <p>9 just take it up to 7. All right. And, again, see</p> <p>10 this email? It's the exact same email you sent to</p> <p>11 Patricia McNulty?</p> <p>12 A. Yup.</p> <p>13 Q. You didn't draft a separate email for her.</p> <p>14 You sent the same -- you didn't draft a separate</p> <p>15 email for Lisa. You sent her the same email you</p> <p>16 sent Ms. McNulty, correct?</p> <p>17 A. Correct.</p> <p>18 Q. And you sent it the exact same time,</p> <p>19 correct?</p> <p>20 A. Yep.</p> <p>21 Q. You didn't think these situations</p> <p>22 warranted a personal response?</p> <p>23 MR. CAVALIER: Object to form.</p> <p>24 BY MR. CARSON:</p>	<p>---</p> <p>1 manager. Right, understood. That's what I heard</p> <p>2 loud and clear.</p> <p>3 Q. So, Mr. Pipes, you decided to interpret</p> <p>4 that sentence as minimizing the sexual misconduct</p> <p>5 and not outlining the seriousness of the deceit and</p> <p>6 the abusive behavior?</p> <p>7 MR. CAVALIER: Object to form.</p> <p>8 BY MR. CARSON:</p> <p>9 Q. Why? Why did you decide to interpret it</p> <p>10 that way?</p> <p>11 A. I'm reading her words. His, quote,</p> <p>12 "inappropriate behavior," unquote, is the least of</p> <p>13 my concern.</p> <p>14 Q. Compared to the deceit and the abusive</p> <p>15 behavior, she said.</p> <p>16 A. Least of my concern. Least of my concern.</p> <p>17 That was not her major issue. Tricia said roughly</p> <p>18 the same thing. Marnie, I believe, said roughly the</p> <p>19 same thing. All our discussions --</p> <p>20 Q. Mr. Pipes --</p> <p>21 A. Let me finish.</p> <p>22 Q. Right. You're gonna answer the</p> <p>23 question --</p> <p>24 A. Let me finish.</p>

Page 221	Page 223
<p>1 --- 2 --- 3 (Indistinguishable cross-talk.) 4 --- 5 THE COURT REPORTER: Okay. Guys, this is 6 my last time, okay? From here on out, it's 7 gonna be whatever comes out, comes out. 8 MR. CAVALIER: I'm amazed you've managed 9 to go this long, Grace. 10 THE COURT REPORTER: Me, too. 11 --- 12 (Indistinguishable cross-talk.) 13 --- 14 THE WITNESS: -- I get to talk and then 15 you wait till -- 16 MR. CARSON: You have to answer the 17 questions I ask. 18 THE WITNESS: No, I don't. 19 MR. CAVALIER: He is answering the 20 questions. 21 MR. CARSON: You actually do, Mr. Pipes. 22 I ask the questions. You answer the questions 23 I ask. 24 MR. CAVALIER: He's allowed to give his complete answer, Seth. You know that.</p>	<p>1 --- 2 you're answering right now? You don't even know 3 what you're answering. 4 MR. CAVALIER: Seth, this is gonna take a 5 long time, and you're gonna have a really 6 jumbled record if you don't let him answer the 7 question -- 8 MR. CARSON: I strike my last question. 9 I'm moving on. 10 MR. CAVALIER: If you want different 11 answers, ask different questions. Otherwise, 12 let him -- 13 MR. CARSON: -- yes or no question. Every 14 time I ask a question, your client decides he's 15 gonna go off on a speech about god knows what. 16 So we're gonna get a clear record, and we're 17 gonna focus on the questions that I'm asking. 18 MR. CAVALIER: Clear record went out the 19 window long ago. 20 BY MR. CARSON: 21 Q. So, anyway, Mr. Pipes, why do you not 22 highlight the deceit and the abusive behavior? Why 23 are you attributing that to his management style? 24 It doesn't say anything about that in this email, does it?</p>
Page 222	Page 224
<p>1 --- 2 MR. CARSON: Can't answer whatever 3 question that you wish I asked. 4 MR. CAVALIER: He's allowed to expound on 5 his answer. You don't have the right to demand 6 a yes or no from him. If he feels the complete 7 answer needs to explain, then he can explain 8 it. He took an oath to tell the whole truth. 9 BY MR. CARSON: 10 Q. So my next question is this. 11 A. I am not gonna deal with your next 12 question. I'm gonna deal with what I was saying. 13 Q. Do you know what you were saying? 14 A. Yes, I know what I was saying. 15 Q. Go ahead. Finish. 16 A. Lisa said here in words I'll, again, 17 quote, his inappropriate behavior is the least of my 18 concern. Tricia said something similar. Marnie 19 said something similar. The emphasis of all three 20 was -- and Matt as well -- was on his being a bad 21 manager. Deceit, abuse, manipulation, and so forth. 22 Yes, they had a lot of complaints about him. 23 Q. Why do you -- 24 A. Let me finish. Q. Mr. Pipes, do you know what question</p>	<p>1 --- 2 A. I'm gonna resume where I was interrupted. 3 Q. Mr. Pipes, forget about the last question. 4 I'll withdraw it. More troubling is the deceit and 5 the abusive behavior, it says. 6 A. I'm gonna resume my prior answer. 7 Q. You don't have to. It's not -- 8 A. I'm going to. 9 Q. I withdrew the question. There's no 10 question pending. 11 A. I wanna finish what I was saying. 12 Q. You just wanna go off on a speech? 13 MR. CARSON: We're gonna go off the 14 record, then, if he's gonna just go off on a 15 speech. There's no question, Jon. 16 MR. CAVALIER: Daniel, let him ask the 17 next question. If he's withdrawing the prior 18 question, there's no point in finishing your 19 answer. He can withdraw the question if he 20 wants to. 21 BY MR. CARSON: 22 Q. "More troubling is the deceit and the 23 abusive behavior." What does that have to do with 24 management style? A. That was her complaint about his</p>

Page 225	Page 227
<p>1 management.</p> <p>2 Q. Where does it say that?</p> <p>3 A. That's what it's about.</p> <p>4 Q. Why? Where does it say it?</p> <p>5 A. She was working with him, and she found</p> <p>6 his management to be deceitful, abusive, and much</p> <p>7 else. She had a long list of complaints, and others</p> <p>8 have other complaints, and this is what you will --</p> <p>9 if you look at my letter to Gregg, I dealt with it.</p> <p>10 I dealt with all the problems in his being the</p> <p>11 supervisor of all these personnel. He did a bad</p> <p>12 job.</p> <p>13 Q. Does she say that she's talking about his</p> <p>14 management style?</p> <p>15 A. Let me finish. He has many virtues, he</p> <p>16 has many skills, but he was a bad manager, and I</p> <p>17 didn't argue with them. I accepted that he was --</p> <p>18 Q. Okay. Thank you, Mr. Pipes.</p> <p>19 A. Let me finish.</p> <p>20 Q. Mr. Pipes, you're not just gonna go off on</p> <p>21 a speech. I didn't ask anything about his</p> <p>22 management style. My question was, where does it</p> <p>23 say in here that she's talking about his management</p> <p>24 style? You're not gonna go off on a speech every</p>	<p>1 Q. Where?</p> <p>2 A. "More troubling is the deceit and abusive</p> <p>3 behavior I witnessed and experienced on a weekly</p> <p>4 basis, which increased after the Israel incident."</p> <p>5 Q. Why do you think that's about his</p> <p>6 management style?</p> <p>7 A. Because he was her manager.</p> <p>8 Q. Couldn't she have been talking about</p> <p>9 sexual misconduct when she said that?</p> <p>10 A. No. She just said that sexual misconduct,</p> <p>11 which she referred to as "inappropriate behavior,"</p> <p>12 was the least of her concerns. No. She was</p> <p>13 concerned with him as a manager, as was Tricia, as</p> <p>14 was Marnie, as was Matt, and as was I.</p> <p>15 Q. That's how you interpreted this letter?</p> <p>16 A. That's how I interpreted this letter.</p> <p>17 Q. Did you ever ask Lisa what she meant by</p> <p>18 it?</p> <p>19 A. We had long discussion. This is a summary</p> <p>20 of our long discussion.</p> <p>21 Q. Did you have a discussion after she</p> <p>22 sent --</p> <p>23 A. Don't interrupt me. And our long</p> <p>24 discussion was about her many grievances with Gregg</p>
Page 226	Page 228
<p>1 time I ask a question, all right? You have to</p> <p>2 answer the questions I ask.</p> <p>3 A. -- the rules of a deposition and what I'm</p> <p>4 allowed --</p> <p>5 MR. CARSON: Jon, can you please explain</p> <p>6 to your client that he has to answer --</p> <p>7 MR. CAVALIER: Seth, if you ask him</p> <p>8 open-ended --</p> <p>9 MR. CARSON: It wasn't an open-ended</p> <p>10 question. Jon, I said, where does it say in</p> <p>11 this email that he's talking about management</p> <p>12 style?</p> <p>13 MR. CAVALIER: He's trying to --</p> <p>14 MR. CARSON: It's a yes or no question.</p> <p>15 He points out the answer as pointing out</p> <p>16 something in the email that he's referencing.</p> <p>17 THE WITNESS: "Where" is not a yes or no</p> <p>18 question.</p> <p>19 MR. CAVALIER: He's trying to explain to</p> <p>20 you where he learned the information.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Does it say in this email that she's</p> <p>23 talking about his management style, yes or no?</p> <p>24 A. Yes.</p>	<p>1 as a manager.</p> <p>2 Q. When was that discussion?</p> <p>3 A. November 1st.</p> <p>4 Q. So this email was sent on November 4th, so</p> <p>5 did you ever have a discussion with her about this</p> <p>6 email?</p> <p>7 A. I don't think so. I don't remember.</p> <p>8 Q. You never followed up with her to talk to</p> <p>9 her about the deceit and the abuse?</p> <p>10 MR. CAVALIER: Object to form.</p> <p>11 THE WITNESS: I dealt with this by</p> <p>12 removing him from her -- being her manager. I</p> <p>13 did what she wanted. I took Gregg out of her,</p> <p>14 Tricia's, and Marnie's lives, and, to some</p> <p>15 extent, Matt's as well.</p> <p>16 Q. Did you deal with the comment that if Lisa</p> <p>17 crosses Gregg, he's gonna slit her throat?</p> <p>18 A. She told me about this, and she also told</p> <p>19 me that she threatened to slit him, slit his throat</p> <p>20 if he didn't behave. So, yeah, this is the way she</p> <p>21 talks.</p> <p>22 Q. But she's not the one who said that.</p> <p>23 Gregg said that, according to her, right?</p> <p>24 A. Gregg talks that way, too.</p>

Page 229	Page 231
<p>---</p> <p>1 Q. That's how Gregg talks, right? He</p> <p>2 threatens to slit people's throats?</p> <p>3 A. I am not --</p> <p>4 MR. CAVALIER: Object to form.</p> <p>5 THE WITNESS: -- other than this one or</p> <p>6 this. I don't know about this, but the point</p> <p>7 is that this is a summary of what our</p> <p>8 discussions have been, and we moved on.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. She --</p> <p>11 A. -- put down on the record her -- her</p> <p>12 complaints, her problems, and she agreed at the end</p> <p>13 of it to the arrangement I had suggested, and we all</p> <p>14 moved on, and there was no more discussion of this.</p> <p>15 Zero. We --</p> <p>16 Q. Do you agree with Gregg --</p> <p>17 A. Let me finish. We addressed it intensely</p> <p>18 for a week, and then we moved on and never discussed</p> <p>19 it again, except with the minor exception of</p> <p>20 March 9th when we alluded to it, and everybody said,</p> <p>21 no problem. Otherwise, it never came up until your</p> <p>22 concocted lawsuits.</p> <p>23 Q. Yeah. You said that about 30 times today.</p> <p>24 On November 5th, 2018, you had a meeting, correct?</p>	<p>---</p> <p>1 which this is only one.</p> <p>2 Q. Do you believe those things?</p> <p>3 MR. CAVALIER: Object to form.</p> <p>4 THE WITNESS: He did acknowledge that he</p> <p>5 said nasty things about me, yeah. And,</p> <p>6 therefore, I'll add I put him on probation and</p> <p>7 said, any serious mistakes you make, you're</p> <p>8 gone. And I also, I might add, looked for</p> <p>9 someone to replace him right there in November.</p> <p>10 BY MR. CARSON:</p> <p>11 Q. And while he was on probation, he never</p> <p>12 once -- you never once got any complaints about him,</p> <p>13 right?</p> <p>14 A. Correct. I remember --</p> <p>15 Q. Sure.</p> <p>16 A. So, yes, he made lots of mistakes before</p> <p>17 November 1st.</p> <p>18 Q. You're not in focus.</p> <p>19 A. Lots of mistakes. And, at the same time,</p> <p>20 he's very skilled, so I said, stop making the</p> <p>21 mistakes. I'll limit -- I'll reduce your</p> <p>22 remuneration. I'll take away all these perks and</p> <p>23 benefits you have. Show me what you can do, that</p> <p>24 you are -- continue to be skilled and behave</p>
Page 230	Page 232
<p>---</p> <p>1 A. On which date?</p> <p>2 Q. On November 5th, 2018, you had a meeting?</p> <p>3 A. Yes.</p> <p>4 Q. Right, and then after that you moved on;</p> <p>5 is that right?</p> <p>6 A. Yeah. Within a few days.</p> <p>7 Q. Can't hear you.</p> <p>8 A. Within a few days, yes. I mean, I asked</p> <p>9 the project directors as well.</p> <p>10 Q. Take a minute and read the rest of the</p> <p>11 paragraph.</p> <p>12 A. Which one?</p> <p>13 Q. This one, and you can read the one below,</p> <p>14 too. Let me know when you want me to move down.</p> <p>15 Well, I can ask, do you agree with Gregg that MEF is</p> <p>16 better without you?</p> <p>17 MR. CAVALIER: Object to form.</p> <p>18 BY MR. CARSON:</p> <p>19 Q. Says here that Gregg claims MEF is better</p> <p>20 without you. Do you agree with that, Mr. Pipes?</p> <p>21 A. No, I don't.</p> <p>22 Q. Do you ever talk to Gregg about that?</p> <p>23 A. I raised with him, in general, the nasty</p> <p>24 things that I was told that he said about me, of</p>	<p>---</p> <p>1 yourself and not do this again, and he did.</p> <p>2 Q. Did you ever take away any perks or</p> <p>3 benefits from Gregg Roman?</p> <p>4 A. Yes, lots. You have a letter.</p> <p>5 Q. Which ones did you take away?</p> <p>6 A. You have the letter. You showed me the</p> <p>7 letter --</p> <p>8 Q. He didn't lose any money, right? You</p> <p>9 didn't take away his salary?</p> <p>10 A. He did. He lost something in the order of</p> <p>11 \$27,000.</p> <p>12 Q. How much?</p> <p>13 A. \$27,000.</p> <p>14 Q. How did he lose \$27,000?</p> <p>15 A. The medical insurance I took away.</p> <p>16 Q. You took it away from everyone because you</p> <p>17 said it's not your policy to do that, right?</p> <p>18 A. No. I didn't take away from -- it all</p> <p>19 from anyone, and I only took it all away from him.</p> <p>20 Q. Gregg Roman bought that policy for the</p> <p>21 office without your permission, correct?</p> <p>22 A. Correct.</p> <p>23 Q. Right?</p> <p>24 A. Right.</p>



Page 233	Page 235
<p>1 Q. You didn't want him to do that. He went 2 rogue and did it on his own, right? 3 A. Right, so I punished him by taking the -- 4 Q. Right. Had nothing to do with the sexual 5 harassment, right? 6 A. No. The sexual harassment meant that he 7 was excluded from the office. Other problems -- 8 spending money -- 9 Q. You keep going out of focus, Mr. Pipes, 10 something about your green screen effect. We need a 11 clear record of the video for the courtroom, so you 12 gotta like move your chair up or something like 13 that. Yeah, there you go. 14 --- 15 (Indistinguishable cross-talk.) 16 --- 17 BY MR. CARSON: 18 Q. Did you talk to Thelma Prosser about what 19 she meant when she said that Gregg was borderline 20 unbearable? 21 MR. CAVALIER: Object to form. 22 THE WITNESS: I went around and talked to 23 everyone about everything that was on their 24 minds November 1st. Whether I went back to</p>	<p>1 Q. Well, could Gregg Roman do anything that 2 could lead to his termination? Is there anything -- 3 is there way you would ever consider firing him? 4 MR. CAVALIER: Same objection. 5 THE WITNESS: I -- you saw the letter to 6 him, and I said, if there's anything along 7 these lines, you will be fired immediately. 8 BY MR. CARSON: 9 Q. Well, today we know there is something 10 along those lines, correct? 11 MR. CAVALIER: Object to form. 12 THE WITNESS: Post November. If there's 13 anything post November 5th, 6th, he would be 14 fired. He did not -- 15 --- 16 (Indistinguishable cross-talk.) 17 --- 18 THE WITNESS: Nobody complained, and 19 therefore he -- 20 BY MR. CARSON: 21 Q. You gotta speak up. 22 A. Nobody complained after November 5th or so 23 and -- 24 Q. Alana Goodman.</p>
Page 234	Page 236
<p>1 --- 2 them again, I don't think so. Whether she 3 mentioned that on November 1st, I can't 4 remember, but I got a complete download of all 5 these many, many complaints about Gregg, which 6 were generally quite consistent that he was 7 doing lots of things wrong as director of the 8 Middle East Forum, and I excluded him from the 9 office for the sake of getting him out of the 10 women's hair so there wouldn't be any 11 allegations and so forth, protect him as well 12 as them. And, on the other hand, I took away 13 all sorts of perks and powers because of his 14 mistakes as director. So I addressed both 15 issues simultaneously and, as you know, got 16 the -- 17 BY MR. CARSON: 18 Q. Gotta speak up. 19 A. As you know, I got the agreement of the 20 principals involved. 21 Q. What would it take to fire Gregg Roman? 22 MR. CAVALIER: Object to form. Object to 23 the incomplete hypothetical. 24 THE WITNESS: Hypothetical. BY MR. CARSON:</p>	<p>1 A. Alana Goodman did not complain to me. 2 Q. So you can pick up the phone and call her 3 and find out if Gregg is using his position as the 4 director of the Middle East Forum to try to force 5 reporters to have sex with him, right? 6 MR. CAVALIER: Object to -- oh, he's gonna 7 call everybody in the world just to ask 8 about -- 9 --- 10 (Indistinguishable cross-talk.) 11 --- 12 MR. CARSON: -- complain that Gregg Roman 13 is trying -- yelling at them across a bar to go 14 to his hotel room in 30 minutes or he's gonna 15 give the story to somebody else. 16 BY MR. CARSON: 17 Q. How about just call those people, 18 Mr. Pipes? Did you ever consider that? 19 MR. CAVALIER: Object to form. Object to 20 foundation. Object to the hypothetical. 21 BY MR. CARSON: 22 Q. You know about it now. You just listened 23 to the recording. Have you ever considered it? 24 What do you consider --</p>

Page 237	Page 239
<p>---</p> <p>1 A. I heard a recording. I don't know its 2 providence. I don't know if it's a paid actress. I 3 don't know anything about it.</p> <p>4 Q. Do you know who Alana Goodman is? 5 A. I told you I -- 6 Q. Is she an actress? 7 MR. CAVALIER: Object to the form. 8 THE WITNESS: I don't know if she's an 9 actress or not, but I don't know who was 10 speaking there. I know nothing about this. If 11 Alana Goodman wants to complain about something 12 that happened some years ago, let her come to 13 me. I am not in the business of investigating 14 my employee's personal life.</p> <p>15 BY MR. CARSON: 16 Q. Yeah. You're not in the business of 17 making your workplace safe for the female employees, 18 correct? 19 MR. CAVALIER: Object to form. Object to 20 argumentative. You don't have to answer that, 21 Daniel. 22 MR. CARSON: Yeah, he does. 23 BY MR. CARSON: 24 Q. Are you in the business of making your</p>	<p>---</p> <p>1 THE WITNESS: Yes. 2 BY MR. CARSON: 3 Q. You really think that? 4 A. I handled these objections -- I handled 5 these complaints expeditiously and satisfactorily. 6 I can't imagine why anyone would not be -- would not 7 come away from this pleased with what I did since 8 the principals were pleased with what I did. 9 Q. Do you think they're still pleased today? 10 A. Well, you got your hands on them, and you 11 got them to ask for \$31 million. Of course not.</p> <p>12 --- 13 (Indistinguishable cross-talk.) 14 --- 15 THE WITNESS: They were content. They 16 wrote -- they signed agreements that this was 17 fine. 18 BY MR. CARSON: 19 Q. You think I called them to sign them up 20 for their cases? That's how you think it works? 21 A. I don't know what happened. \$31 million 22 will certainly influence a lot of people's memories, 23 including yours. How much are you getting, 14 24 million out of it, 13 million? Good amount, Mr. --</p>
Page 238	Page 240
<p>---</p> <p>1 workplace safe for the female employees who work 2 there? 3 MR. CAVALIER: Again, same objection. You 4 can answer it if you want to, Daniel, but you 5 don't have to. It's argumentative. 6 BY MR. CARSON: 7 Q. No. You do have to. 8 A. I'm in the business of making the 9 workplace safe for all the employees, and, indeed, 10 we have gone to great lengths to make the workplace 11 safe. As you've heard, we have all sorts of 12 safeguards in place to protect everyone from 13 dangers. Yes, it's a very high priority for me, and 14 we have done so. And, indeed, in this case -- 15 Q. You gotta speak up. 16 A. Where there was an allegation -- where 17 there were allegations against Gregg, I dealt with 18 them immediately and radically until the 19 satisfaction of those who complained. 20 Q. You think a female employee would feel 21 comfortable reporting sexual harassment today after 22 the way you've handled the last ten reports? 23 MR. CAVALIER: Object to the incomplete 24 hypothetical. You can answer.</p>	<p>---</p> <p>1 Q. Mr. Pipes, if you wanna pay me 14 million, 2 that's fine, but I can assure you I will never get 3 \$14 million out of this case or anything -- 4 A. We can agree on that, Mr. Carson. You're 5 not gonna get -- 6 Q. I think we can. Off the record I can tell 7 you what I really think about that, but, anyway, 8 let's keep going. So one of the things that Lisa 9 writes in this email to you is that she would be 10 willing to participate in any investigation of Gregg 11 Roman, correct? 12 A. Where? 13 Q. Just take a minute and read. Do you see 14 what I highlighted there? 15 MR. CAVALIER: Seth, I'd ask, if you're 16 gonna ask about a sentence referencing 17 aforementioned instances, that you position the 18 document so that we can see the aforementioned 19 instances. 20 MR. CARSON: We just read the rest of the 21 document. I just got done scrolling down. 22 It's the same email we're talking about the 23 last hour. 24 MR. CAVALIER: If you're gonna ask him</p>

Page 241	Page 243
<p>---</p> <p>1 questions about it, he should be able to see</p> <p>2 it, right?</p> <p>3 BY MR. CARSON:</p> <p>4 Q. -- need me to scroll back up, let me know,</p> <p>5 but I'm also talking about this. It says, "I am</p> <p>6 satisfied with the speed of the inquiry yet</p> <p>7 disappointed in the discovery aspect of the</p> <p>8 incident. I will, as requested, submit a separate</p> <p>9 detailed description of the events that occurred on</p> <p>10 March 14 in addition to all corroborating evidence."</p> <p>11 So she does tell you that she's willing to continue</p> <p>12 to help you corroborate the allegations made, right?</p> <p>13 It's what she said. It's what the document says.</p> <p>14 A. Yeah.</p> <p>15 Q. But there was no investigation done after</p> <p>16 this letter was sent, correct?</p> <p>17 MR. CAVALIER: Object to form.</p> <p>18 BY MR. CARSON:</p> <p>19 Q. Did you investigate anything after this</p> <p>20 letter? Remember, it's dated November 4th.</p> <p>21 A. The issue was closed.</p> <p>22 Q. The issue was closed. That's right.</p> <p>23 Okay. We can move on to the next exhibit. Where</p> <p>24 are we? All right. So, just to round it out, I</p>	<p>---</p> <p>1 A. I agree. I see it, yes.</p> <p>2 Q. Okay. And you sent them all at 11:34.</p> <p>3 This one says 11:34, too, and that's a.m., correct?</p> <p>4 A. It's a.m., yup.</p> <p>5 Q. Okay. And then Marnie responds, right,</p> <p>6 and she's worried about Gregg having access to</p> <p>7 emails and passwords. Do you see that?</p> <p>8 A. Yep.</p> <p>9 Q. And then, down here -- this is part of the</p> <p>10 same exhibit -- it's a memorandum. Now, I think</p> <p>11 that this is a memorandum that you sent to the</p> <p>12 entire office. This looks like one of those things</p> <p>13 where you have like a group email. Is that what</p> <p>14 this is?</p> <p>15 A. Yep.</p> <p>16 Q. Can you speak up, please, Mr. Pipes?</p> <p>17 A. Yes, yes.</p> <p>18 Q. And this email is -- looks like it was</p> <p>19 sent on November 4th and -- "I am again addressing</p> <p>20 this memo to everyone who works at MEF," and,</p> <p>21 basically, you're announcing the staff meeting that</p> <p>22 occurred on November 5th, 2018, right?</p> <p>23 A. Yes.</p> <p>24 Q. And Gregg Roman was initially invited to</p>
Page 242	Page 244
<p>---</p> <p>1 won't spend a lot of time on it because I'm sure</p> <p>2 you'll get questions on it from another lawyer at</p> <p>3 some point. So exhibit number -- I don't know what</p> <p>4 number we're on.</p> <p>5 THE VIDEOGRAPHER: Sorry, counsel. We</p> <p>6 are -- I'm at Pipes-8. So we just finished</p> <p>7 Pipes-7, which were pages five through seven of</p> <p>8 the large Bates-marked document.</p> <p>9 MR. CARSON: All right. So 11 -- the next</p> <p>10 one will be 11 -- 11 through 15, I guess.</p> <p>11 THE VIDEOGRAPHER: All right. Thank you.</p> <p>12 And we'll mark it as Pipes-8 for exhibition.</p> <p>13 BY MR. CARSON:</p> <p>14 Q. All right. So this is an email. This is</p> <p>15 the same email that we already looked at for the</p> <p>16 other two women. He sent it at 11:34 where you talk</p> <p>17 about the investigation you did yesterday. Do you</p> <p>18 recall that?</p> <p>19 A. I don't recall it, but I see it.</p> <p>20 Q. I'm sorry?</p> <p>21 A. I don't recall it, but I see it.</p> <p>22 Q. Wait. What don't -- you don't recall --</p> <p>23 remember we talked -- you sent this one to Lisa and</p> <p>24 Tricia, too?</p>	<p>---</p> <p>1 that meeting, correct?</p> <p>2 A. Correct.</p> <p>3 Q. And then you disinvited him when you</p> <p>4 realized it would make the women uncomfortable?</p> <p>5 MR. CAVALIER: Object to form.</p> <p>6 THE COURT REPORTER: I can't hear you, Mr.</p> <p>7 Pipes.</p> <p>8 THE WITNESS: Legal privilege.</p> <p>9 THE COURT REPORTER: What was that?</p> <p>10 THE WITNESS: Legal privilege.</p> <p>11 MR. CAVALIER: You're saying the reason</p> <p>12 that you disinvited Gregg Roman has to do with</p> <p>13 legal, so we're gonna object to that and not</p> <p>14 answer the question under --</p> <p>15 BY MR. CARSON:</p> <p>16 Q. No. I think what you're trying to say is</p> <p>17 Marc told you, but I'm not asking what Marc told</p> <p>18 you. I'm asking, why did you decide not to -- if</p> <p>19 the only answer is that you're following the advice</p> <p>20 of counsel, I guess you don't have to answer, but</p> <p>21 I'll ask this for the record: Why did you tell</p> <p>22 Gregg not to come to the meeting?</p> <p>23 MR. CAVALIER: We're gonna assert to</p> <p>24 privilege to that, Seth.</p>

Page 245	Page 247
<p>---</p> <p>1 MR. CARSON: Well, he has to decide</p> <p>2 whether that's true.</p> <p>3 THE WITNESS: Yeah, legal privilege.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. Did you think it was appropriate to invite</p> <p>6 him in the first place?</p> <p>7 A. Legal privilege.</p> <p>8 Q. That's not legally privileged. I'm not</p> <p>9 asking about any communication between you and</p> <p>10 counsel.</p> <p>11 A. Yeah, it was.</p> <p>12 Q. Well, it was appropriate?</p> <p>13 A. This was -- these decisions to invite him</p> <p>14 and then not to invite him --</p> <p>15 Q. We can't hear you, Mr. Pipes.</p> <p>16 A. The decisions to invite him and then not</p> <p>17 to invite him were based on conversations with Marc</p> <p>18 Fink.</p> <p>19 Q. I'm asking in your opinion. You're the</p> <p>20 director of the Middle East Forum. It's your job to</p> <p>21 enforce MEF policy, especially their</p> <p>22 anti-discrimination policy. So I'm asking, based on</p> <p>23 that, do you think it's appropriate to make the</p> <p>24 women who are accusing someone of sexual harassment</p>	<p>---</p> <p>1 can move on.</p> <p>2 MR. CAVALIER: Okay.</p> <p>3 THE WITNESS: Give me a moment. Give me a</p> <p>4 moment.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. Go ahead.</p> <p>7 A. I initially invited him -- go back to that</p> <p>8 memo. The key section here was, "I am sending you a</p> <p>9 new NDA," and I included Gregg because I wanted him</p> <p>10 to sign the NDA. I actually never had any intention</p> <p>11 of his appearing, but I did want to get his NDA,</p> <p>12 and, therefore, I made it seem to him that he was</p> <p>13 coming so it made it more likely he would sign it,</p> <p>14 but I had no intention of his being there.</p> <p>15 Q. Wasn't it already signed?</p> <p>16 A. No. There wasn't clear that -- no, didn't</p> <p>17 happen.</p> <p>18 Q. Didn't you send an email to everyone</p> <p>19 saying he's no longer coming anymore?</p> <p>20 A. Yes, subsequently, when he did sign it.</p> <p>21 Q. Mr. Pipes, I'm gonna move on. The -- the</p> <p>22 next exhibit I'll show you is -- so, I guess, since</p> <p>23 you brought up the NDA, I'll just -- why did you</p> <p>24 want everyone to sign an NDA before the</p>
Page 246	Page 248
<p>---</p> <p>1 face the harasser directly?</p> <p>2 MR. CAVALIER: Object to form.</p> <p>3 THE WITNESS: He wasn't there, so it's a</p> <p>4 hypothetical question.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. I think your actions speak for themselves,</p> <p>7 so I'll move on.</p> <p>8 A. Well, let me think.</p> <p>9 Q. You can answer.</p> <p>10 A. All right. I guess I'll tell you.</p> <p>11 MR. CARSON: Jon, you wanna jump in?</p> <p>12 MR. CAVALIER: If you want to answer --</p> <p>13 there's no question pending, Daniel, but --</p> <p>14 THE WITNESS: Well, I didn't answer</p> <p>15 before.</p> <p>16 MR. CARSON: I just wanna be fair to you.</p> <p>17 THE WITNESS: And I did command privilege,</p> <p>18 but --</p> <p>19 MR. CAVALIER: Just -- just so -- you</p> <p>20 can't talk about anything substantive that you</p> <p>21 talked about with Marc.</p> <p>22 MR. CARSON: Yeah. I can move on --</p> <p>23 MR. CAVALIER: -- want to. You still can.</p> <p>24 MR. CARSON: This is not a big deal. We</p>	<p>---</p> <p>1 November 5th, 2018 meeting?</p> <p>2 MR. CAVALIER: To the extent you can</p> <p>3 answer that question without talking about</p> <p>4 legal advice, you can answer it. If you need</p> <p>5 to rely on legal advice to answer the question,</p> <p>6 we're gonna assert to privilege.</p> <p>7 THE WITNESS: I believe we had NDAs from</p> <p>8 everyone but -- but Gregg, so --</p> <p>9 BY MR. CARSON:</p> <p>10 Q. Where did you --</p> <p>11 A. I sent it to everyone to de-emphasize the</p> <p>12 fact that, actually, the only person we really cared</p> <p>13 about was Gregg.</p> <p>14 Q. But, like, I guess my question is, I would</p> <p>15 be concerned about the chilling effect that an NDA</p> <p>16 might have on future reports. Did you consider that</p> <p>17 at all?</p> <p>18 A. No.</p> <p>19 Q. There were some new stipulations in that</p> <p>20 NDA, right?</p> <p>21 A. Yes.</p> <p>22 Q. Do you know what they were off the top of</p> <p>23 your head?</p> <p>24 A. No.</p>



Page 249	Page 251
<p>---</p> <p>1 Q. Do you know what you guys were talking 2 about in this here? I think it's trying to figure 3 out -- I'll bring your attention to this.</p> <p>4 A. Self-explanatory, no?</p> <p>5 Q. Well, it says, "Marnie, Marc, and I have 6 been working on this." Do you know what "this" is 7 when you guys -- what "this" is there?</p> <p>8 A. Well, it says the letter to GR, new terms 9 of employment.</p> <p>10 Q. So that was like trying to figure out what 11 his terms of employment would be post November 5th, 12 2018?</p> <p>13 A. And I discussed it with various people, 14 including --</p> <p>15 Q. No. It wasn't a real question that time. 16 I just didn't know. Thank you, though.</p> <p>17 A. Marnie was part of the discussion.</p> <p>18 Q. All right. So I'll wait to do that. Did 19 you ever take Gregg Roman's key away from him?</p> <p>20 A. Personally, no, but someone did.</p> <p>21 Q. How does that work? Like is there 22 actually -- like I don't have a key to my office. I 23 have like a card that gets me in everywhere. Do you 24 have cards, or do you have like a physical key that</p>	<p>---</p> <p>1 Q. Do you know for a fact that Gregg ever 2 lost his key and his card? Strike that. Do you 3 know for a fact that Gregg Roman's key and card were 4 actually physically taken away from him?</p> <p>5 A. Yes.</p> <p>6 Q. How do you know that?</p> <p>7 A. He -- I was told that -- I asked for it to 8 be handed in, and it was handed in.</p> <p>9 Q. Marnie Meyer told you that?</p> <p>10 A. I can't be specific. It's two years ago. 11 I know, to my satisfaction, his key was removed, and 12 when he did come to the office to take away his 13 personal effects, I was there, went downstairs and 14 let him in, and watched as he packed up and took his 15 stuff out.</p> <p>16 Q. All right. So I guess I will show it to 17 you. So the next document is 17. It's right here. 18 We're on it now. So 17 and, I guess, 18 will be a 19 document, and this document is dated March 11th, and 20 it's from Tricia McNulty. So you testified earlier 21 that Ms. McNulty was happy to have Gregg come back; 22 is that correct?</p> <p>23 A. Correct.</p> <p>24 Q. Did Ms. McNulty or Ms. Barbounis or anyone</p>
Page 250	Page 252
<p>---</p> <p>1 you took from him?</p> <p>2 A. Card. Card was taken from him.</p> <p>3 Q. So was Gregg Roman's privileges to come to 4 the office like physically taken away, as in, if he 5 wanted to come, he wouldn't have been able to 6 because he didn't have a key or card anymore; is 7 that right?</p> <p>8 A. Yes.</p> <p>9 Q. Yeah?</p> <p>10 A. Yes.</p> <p>11 Q. When did that happen?</p> <p>12 A. Immediately.</p> <p>13 Q. Do you know who did that?</p> <p>14 THE COURT REPORTER: I didn't catch what 15 Mr. --</p> <p>16 BY MR. CARSON:</p> <p>17 Q. Daniel, I think the court reporter is 18 having a tough time hearing you.</p> <p>19 A. Marnie, I believe, is head of human 20 resources.</p> <p>21 Q. So Marnie would've done that, the 22 actual -- physically making sure he doesn't have 23 access anymore?</p> <p>24 A. I believe so.</p>	<p>---</p> <p>1 want conditions on that, on him coming back?</p> <p>2 A. Yeah. They reiterated the conditions that 3 we had agreed on.</p> <p>4 Q. Okay. And so then, I guess, based on 5 that, I think this is what we're talking about. Can 6 you just review this -- this email? Just let me 7 know when you're done.</p> <p>8 A. Okay.</p> <p>9 Q. All right. So this is an email that 10 Ms. McNulty sent you on March 11, 2019; is that 11 correct?</p> <p>12 A. That's what it says.</p> <p>13 Q. And do you remember receiving this email?</p> <p>14 A. I do not.</p> <p>15 Q. But you did receive it?</p> <p>16 A. I assume it's valid, yeah.</p> <p>17 Q. Okay. And I'll represent to you it was 18 produced by your lawyers and was marked by your 19 attorneys D0000017. And it says, "My understanding 20 of the meeting outcome is that Gregg will serve as 21 the Forum's director once again with certain 22 parameters in place. At a minimum, the first six 23 months will essentially be a probationary period 24 with Daniel looking over Gregg's shoulder to be sure</p>

Page 253	Page 255
<p>1 no improprieties are being made." So Ms. McNulty  2 said -- she allowed for him to return as long as  3 certain parameters remained in place, correct?  4 A. Yep.  5 MR. CAVALIER: Object to form.  6 BY MR. CARSON:  7 Q. She -- she acquiesced to his return as  8 long as certain parameters were in place, correct?  9 A. No.  10 Q. What do you mean, no?  11 A. The verb "acquiesce".  12 Q. What's the word you would use?  13 A. Look at No. 2: "I think there should be  14 no problem with Gregg being in the office." That  15 was not an acquiescence. That was an agreement.  16 Q. Okay. She agreed that he could return as  17 long as certain parameters remained in place, right?  18 A. Right.  19 Q. Okay. We'll use the word "agreement".  20 And one of those parameters was that it be a  21 probationary period, right?  22 A. Right.  23 Q. And --  24 A. All this confirms the discussion we had on</p>	<p>1 at any time should they wish to raise concerns and  2 that, unlike before, there can be no directive to  3 discuss anything with Daniel," right?  4 A. Yup, that's what it says.  5 Q. Sorry. Can you say that louder?  6 A. That's what it says.  7 Q. So, again, it references that, before,  8 Gregg Roman maintained a policy where people weren't  9 allowed to come to you, right?  10 MR. CAVALIER: Object to form. Object to  11 the categorization.  12 BY MR. CARSON:  13 Q. Well, that's what she's talking about,  14 correct?  15 A. That is what she's saying, yes.  16 Q. Did you disagree that he did that? Did he  17 ever disagree he did that?  18 MR. CAVALIER: Object to form.  19 THE WITNESS: All I know is they did come  20 to me, and I acted promptly and effectively, so  21 this whole thing doesn't make much sense to me.  22 BY MR. CARSON:  23 Q. Did you --  24 A. They did come, and they got the relief</p>
Page 254	Page 256
<p>1 the 9th of March. This is not breaking ground; this  2 is confirming the points we --  3 Q. Can you speak up just a little?  4 A. -- the points that Gregg had agreed upon  5 as well at the meeting. He was there at that  6 meeting on March 9th. We all agreed.  7 Q. Where was the meeting on March 9th?  8 A. At the office.  9 Q. It was in your office?  10 A. The Middle East Forum office, yes.  11 Q. In the what?  12 A. Middle East Forum office, yes.  13 Q. Middle East Forum office, okay. And --  14 and who was at that meeting? Was it you, Gregg,  15 Lisa, Patricia, Marc?  16 A. Marnie, Thelma. I forget whether it was  17 Delaney or Caitriona. One of them was there, and  18 one wasn't.  19 Q. Okay.  20 A. Matt was there. Essentially, everyone  21 except either Caitriona or Delaney was not there,  22 and Marc was on the telephone.  23 Q. Okay. So it says, "Gregg knows that those  24 in the office are allowed to talk to Daniel directly</p>	<p>1 they sought.  2 Q. Did you know that Gregg Roman dissuaded  3 employees from going to you before November 1st,  4 2018?  5 MR. CAVALIER: Object to form. Lack of  6 foundation.  7 BY MR. CARSON:  8 Q. Did you know that he did that?  9 A. Well, I didn't know that there were  10 allegations that he did that. Whether he did it or  11 not, I don't know, but there were definitely  12 allegations that he told staff to bring their  13 complaints to him and not to me.  14 Q. Well, did you ever talk to him about it?  15 A. I don't remember. What I did make clear  16 is that, henceforth, you are welcome to tell me --  17 said it again, and, indeed, Tricia's note reflects  18 that -- that, in the future, we are free to come to  19 you.  20 Q. Did you make it clear to Gregg Roman that  21 he wasn't permitted to do that anymore?  22 A. Definitely. Well, I mean, I don't know if  23 he ever did, but definitely he couldn't do that in  24 the future. It was a whole different regime</p>

Page 257	Page 259
<p>1 starting in November. Everything changed concerning  2 Gregg. He was no longer in the office, no longer  3 managing the office --  4 Q. It was just a yes or no question,  5 Mr. Pipes. I asked, did you make it clear to Gregg  6 Roman that he could not tell employees that they  7 weren't allowed to come to you?  8 MR. CAVALIER: Object to form.  9 THE WITNESS: I will answer as I see fit.  10 BY MR. CARSON:  11 Q. It's just -- did you ever talk to him  12 about it? It's a simple question.  13 A. I will answer as I see fit, and I did.  14 Q. Can you please say yes or no as part of  15 your answer?  16 MR. CAVALIER: He already did.  17 THE WITNESS: -- answer as I see fit.  18 BY MR. CARSON:  19 Q. Well, I didn't hear you. Was your answer  20 yes or no to that?  21 A. You're not gonna tell me how to answer.  22 Q. I didn't hear --  23 ---  24 (Indistinguishable cross-talk.)</p>	<p>1 BY MR. CARSON:  2 Q. You think that's a minor detail?  3 A. That was a minor detail in the whole  4 panoply of complaints. That was one of many  5 complaints against Gregg.  6 Q. Well, couldn't that explain why no one  7 came to you for eight months? You keep talking  8 about how -- I don't know why they didn't come to me  9 for eight months. I can't believe they didn't come  10 to me for eight months. So, in that context, it's  11 not very minor if there was a policy that they  12 weren't allowed to go to you, right?  13 A. No.  14 MR. CAVALIER: Object to form.  15 THE WITNESS: Makes no sense. First of  16 all, they knew from me that my door was open, I  17 wanted no surprises, and, secondly, they did  18 come to me, and they got satisfaction.  19 BY MR. CARSON:  20 Q. Okay. They got satisfaction until I  21 called them and started a conspiracy against your  22 business, right?  23 A. Thank you for acknowledging that.  24 Q. That's what you think happened, right?</p>
Page 258	Page 260
<p>1 ---  2 ---  3 BY MR. CARSON:  4 Q. Did you say yes or no to that question?  5 A. I didn't answer that question. I already  6 answered --  7 Q. Okay. So can we try to answer that  8 question, then? Did you ever talk to Gregg Roman  9 about that? Did you ever tell him, hey, I don't  10 know whether you did this in the past, but, going  11 forward, you can't do that anymore? Did you ever  12 say that?  13 MR. CAVALIER: Object to form, but you can  14 answer that question, Daniel.  15 THE WITNESS: That's too specific. I do  16 not know what -- I do not remember what exactly  17 I said. I do know that I told him that this  18 was -- your management of the office personnel  19 was terrible. You're not gonna happen --  20 you're not gonna be managing it henceforth.  21 There's wholesale changes. Among those, any  22 possibility of his telling anyone not to talk  23 to me, but that was a minor detail of a much  24 larger picture. Whether I brought up that  25 minor detail specifically or not, I don't know.</p>	<p>1 ---  2 A. Yeah.  3 Q. That's what you believe, right?  4 A. Yeah. \$17 million divided four, five ways  5 is a lot of money.  6 Q. Did you ever threaten Lisa Barbounis with  7 a RICO case?  8 MR. CAVALIER: Object to form.  9 THE WITNESS: I'm glad you raised that.  10 ---  11 (Indistinguishable cross-talk.)  12 ---  13 THE WITNESS: -- explain what happened,  14 and you're just gonna have to listen to me.  15 BY MR. CARSON:  16 Q. I will --  17 A. I did not --  18 Q. I will allow you to explain, but can you  19 please say yes or no as part of your answer? Did  20 you ever --  21 A. No, I did not. Let me explain.  22 Q. Okay. Go ahead.  23 A. We met twice on October 12th and October  24 14th, a month ago.  25 Q. Speak up a little, please.</p>

Page 261	Page 263
<p>---</p> <p>1 A. And that first time I referenced the RICO 2 case. She expressed complete ignorance of it. So 3 the second time, on October 14th, I brought with me 4 a printout of the letter that you received, 5 Mr. Carson, and presumably had passed on to your 6 client, dated September 29th, informing you of the 7 RICO case. I did not threaten her with it. I 8 informed her, since you apparently did not, that 9 there's a RICO case that had been initiated against 10 her. So, no, there was no threat. It was 11 information, strange information that I should have 12 to provide to her since the letter went to you and, 13 presumably, you received it, and you didn't pass it 14 on to her. So, no, there was no threat whatsoever. 15 All I said was, this is underway. I hope we can 16 reconcile our differences so that this can -- this 17 and everything else can be stopped. She knew about 18 the employment claim; she knew about the trade secrets 19 claim. She did not know about the RICO claim. 20 Therefore, I thought it would be useful for her to 21 know about that. That she portrayed it to you as a 22 threat shows, once again, her -- how shall I put 23 it -- lack of veracity. There was no threat. It 24</p>	<p>---</p> <p>1 MR. CAVALIER: Object to form. 2 THE WITNESS: No, I did not. 3 BY MR. CARSON: 4 Q. Did you request the email? Did you ask 5 them to confirm with you that Gregg could come back? 6 A. No. 7 Q. You never said to them, hey, I need you 8 guys to send me an email if he's gonna come back? 9 You gotta send me an email saying that. 10 A. No. 11 Q. So your testimony is that they 12 unilaterally both decided to send you an email 13 confirming that it was okay if he came back on their 14 own? 15 A. No. 16 MR. CAVALIER: Object to form. 17 BY MR. CAVALIER: 18 Q. Well, which one is it? 19 MR. CAVALIER: Object to form. 20 THE WITNESS: Mr. Carson, if you look in 21 front of you, it says, from Marc Fink. It's 22 not from me. 23 BY MR. CARSON: 24 Q. I wasn't referencing anything right now.</p>
Page 262	Page 264
<p>---</p> <p>1 was informational. Here, Lisa, is the letter that 2 was sent about two weeks ago to your counsel, which, 3 for some reason, he didn't make available to you, 4 and then she portrayed that as a threat. No. No 5 threat. But I said, if we don't quit, we will have 6 to go forward with it, and I don't wanna. I'd 7 rather bury this whole thing. We can do this now, 8 you and I. She said no. She can -- subsequently, 9 she wrote me and said, no, she's gonna continue with 10 it. So we are continuing with it as well. 11 Q. Did you use the word "scuttle"? Did you 12 say you'd scuttle the RICO case? 13 A. I do not remember what verbs I used. I 14 can tell you that I suggested that if we reached an 15 agreement between her and the Middle East Forum, all 16 these cases would be closed, including three that I 17 mentioned and the fourth -- the three that she knew 18 about and the fourth that she did not know about. 19 Q. So you asked Ms. McNulty and Ms. Barbounis 20 to send you an email saying that it was okay if 21 Gregg came back to the Forum, right? 22 MR. CAVALIER: Object to form. 23 BY MR. CARSON: 24 Q. You requested that email, right?</p>	<p>---</p> <p>1 I was just asking you a question. 2 A. You, you, you, you. No, it wasn't me. 3 Q. I was talking about this one, actually, 4 the email that she sent on March 11th. That was 5 after a meeting you held on March 9th, right? 6 A. I believe it's addressed to Marc Fink, not 7 to me. 8 Q. Right, okay, and you're cc'd on it, right? 9 A. I was cc'd. 10 Q. And she's saying -- she's confirming a 11 meeting, right? 12 A. Mm-hmm. 13 Q. So isn't it true that she was asked to 14 send this email and that Lisa was asked to send a 15 similar email? 16 A. Yes. 17 Q. Okay. Thank you. All right. So the next 18 exhibit will be -- do you think Ms. Barbounis has 19 stolen anything from you? 20 A. Yes. 21 Q. What? 22 A. Trade secrets. 23 Q. What are the trade secrets you think she 24 stole?</p>



Page 265	Page 267
<p>1 A. A donor list, Middle East Forum internal 2 discussions, Forum projects. I don't know what 3 else. 4 Q. Please just talk a little louder. So when 5 you say "a donor list," what do you mean by that, 6 you know? Like what -- like you think she still has 7 a list of donors' names? Is that what you're 8 saying? 9 MR. CAVALIER: Seth -- one second, Daniel, 10 before you answer -- you're going off into 11 another case. 12 MR. CARSON: No, I'm not. You guys have a 13 counterclaim in this case that's based on this 14 stuff. 15 MR. CAVALIER: To the extent you stay 16 within this case, we'll let you go. I just 17 wanted to let you know that I don't wanna get 18 into a full-blown discussion of -- 19 MR. CARSON: Yeah, I don't either. I have 20 two more hours -- two and a half more hours, 21 whatever it is, so I'm trying to -- 22 MR. CAVALIER: All right. So long as 23 we're on the same page, I'll certainly grant 24 you a little leeway.</p>	<p>1 she sent information from our donor list to at least 2 one other nonprofit looking to raise funds. 3 Q. Who? 4 A. Amy Mekelburg. And we know that she used 5 our information to try and help the Rebel to raise 6 money from -- 7 Q. What's a Rebel? 8 A. It's a media organization in Canada. 9 --- 10 (Indistinguishable cross-talk.) 11 --- 12 BY MR. CARSON: 13 Q. Are you talking about Tommy Robinson? 14 A. No, no. 15 Q. Okay. 16 A. We have reason to believe -- we have 17 specifics that she used information of ours to help, 18 and perhaps herself, gain income by helping other 19 nonprofits. So, no, the fact that I have not heard 20 from donors saying, oh, Lisa contacted me, no, that 21 wasn't the issue. The issue was that she was giving 22 it to others, and others would use it, and our 23 donors know that Amy Mekelburg got their names from 24 us.</p>
Page 266	Page 268
<p>1 BY MR. CARSON: 2 Q. So -- [unintelligible] -- you think she 3 has a list of the names and donors' names and phone 4 numbers? What're we talking about? 5 A. Yes. 6 Q. Has any of these donors ever told you that 7 she contacted them? 8 A. No. 9 Q. So if she had a list of donors that just 10 happen to be on a hard drive somewhere and she never 11 contacted them, do you have a problem with that? 12 A. Yes. 13 MR. CAVALIER: Object to form. 14 BY MR. CARSON: 15 Q. Do you think that she did something wrong 16 if she -- she did work with the donor list when she 17 worked with the Middle East Forum, right? 18 A. Yes. 19 Q. That was a yes, right? 20 A. Yes. 21 Q. You think she ever stole anything else 22 besides donor list? 23 A. Well, let's not leave that subject yet. 24 We know that she sent it to at least one other --</p>	<p>1 Q. Well, do you know if Amy Mekelburg ever 2 tried to contact a donor? 3 A. I don't. I know that Lisa gave our 4 information to Amy Mekelburg, and that is stealing. 5 Q. What information do you think she gave? 6 A. Our donor list. 7 Q. You think she sent a donor list to Amy 8 Mekelburg? 9 A. I do. 10 Q. Do you think she stole anything else? 11 A. She stole media contacts. 12 Q. What media contacts? 13 A. That was her job, to deal with the media. 14 Q. What media contacts did she steal? 15 A. She stole the list of media contacts. 16 Q. That's your information? Other people's 17 contact information belongs to you? 18 A. Of course. When it's put together into a 19 list, it becomes privileged trade secret 20 information. 21 Q. A list of public information about 22 contacts in the media is trade secrets? 23 MR. CAVALIER: Object to the 24 characterization of the document. Object to</p>

Page 269	Page 271
<p>1 form.</p> <p>2 THE WITNESS: Same goes with the donors.</p> <p>3 The donors are generally not secret, but</p> <p>4 knowing who to go to and what their views are</p> <p>5 and what their positions are. Likewise, with</p> <p>6 the media, to know who to go to at a</p> <p>7 publication or television station is, yeah,</p> <p>8 important information [inaudible] and she took</p> <p>9 that from us.</p> <p>10 BY MR. CARSON:</p> <p>11 Q. You think that you own information about</p> <p>12 how to contact TV stations and newspapers? That's</p> <p>13 your --</p> <p>14 MR. CAVALIER: Object to the</p> <p>15 categorization of the testimony. And, Seth, by</p> <p>16 the way, I gave you a little leeway, but I just</p> <p>17 wanna remind you the trade secret issues are in</p> <p>18 a separate --</p> <p>19 ---</p> <p>20 (Indistinguishable cross-talk.)</p> <p>21 ---</p> <p>22 MR. CAVALIER: There are no counterclaims</p> <p>23 about any theft in this case. [Inaudible]</p> <p>24 trade secrets.</p>	<p>1 ---</p> <p>2 BY MR. CARSON:</p> <p>3 Q. What's your counterclaim, Mr. Pipes? Why</p> <p>4 did you counterclaim in this case?</p> <p>5 MR. CAVALIER: Seth, he -- if you can</p> <p>6 answer that off the top of your head, Daniel.</p> <p>7 THE WITNESS: I can. I'm --</p> <p>8 MR. CAVALIER: Go for it.</p> <p>9 THE WITNESS: I'm here to discuss my being</p> <p>10 the head of the Forum, my being Gregg's</p> <p>11 supervisor. I am not prepared to talk about</p> <p>12 the counterclaim.</p> <p>13 BY MR. CARSON:</p> <p>14 Q. It doesn't matter whether you're prepared.</p> <p>15 That's not my problem, Mr. Pipes. We're gonna talk</p> <p>16 about this because it's your counterclaim, and</p> <p>17 unless you're gonna agree that we can do another</p> <p>18 deposition, talk about the counterclaim --</p> <p>19 MR. CAVALIER: To be clear, we are -- you</p> <p>20 can ask whatever you want about the</p> <p>21 counterclaims, but they are -- the trade</p> <p>22 secrets theft allegations are not part of these</p> <p>23 counterclaims. It's a totally separate case.</p> <p>24 MR. CARSON: Read your counterclaim a</p>
Page 270	Page 272
<p>1 ---</p> <p>2 MR. CARSON: I'm following his answer</p> <p>3 [inaudible].</p> <p>4 BY MR. CARSON:</p> <p>5 Q. But, I mean, look. Did she steal anything</p> <p>6 else besides the names and phone numbers of public</p> <p>7 information in the media?</p> <p>8 MR. CAVALIER: Object to form.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. Mr. Pipes, I'm trying to --</p> <p>11 A. -- to discuss this today. I thought we</p> <p>12 were talking about the employment case.</p> <p>13 Q. We are, but you made a counterclaim in</p> <p>14 this case, so it's the same case. So --</p> <p>15 MR. CAVALIER: Hold on. Seth, hold on.</p> <p>16 There's no counterclaim for theft of trade</p> <p>17 secrets or theft of anything.</p> <p>18 MR. CARSON: Yeah, there is, actually.</p> <p>19 Read your counterclaim.</p> <p>20 MR. CAVALIER: I'm looking at it right</p> <p>21 now.</p> <p>22 MR. CARSON: Look at it a little closer.</p> <p>23 MR. CAVALIER: Seth --</p> <p>24 ---</p> <p>(Indistinguishable cross-talk.)</p>	<p>1 ---</p> <p>2 little more closely, but, Jon, is the \$7,500</p> <p>3 part of the counterclaim?</p> <p>4 MR. CAVALIER: Nobody has alleged that</p> <p>5 Lisa Barbounis stole \$7,000 from the Middle</p> <p>6 East Forum.</p> <p>7 MR. CARSON: Well, tell me what your</p> <p>8 counterclaim is based on --</p> <p>9 MR. CAVALIER: My counterclaim is based on</p> <p>10 breach of duty of loyalty for her failure to</p> <p>11 disclose that she knew about the theft or</p> <p>12 reported to the Middle East Forum, it's civil</p> <p>13 conspiracy based on her interactions with</p> <p>14 Daniel Thomas around that misappropriation, and</p> <p>15 it's fraudulent misrepresentation relating to</p> <p>16 what she told MEF she was doing while she was</p> <p>17 getting paid by them while she was off doing</p> <p>18 other things. There's no trade secret</p> <p>19 allegations in these counterclaims. I'm</p> <p>20 looking at it right here.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Does that help you, Mr. Pipes? I allowed</p> <p>23 Mr. Cavalier to do that because I thought it might</p> <p>24 help focus the issues.</p> <p>A. Okay, yep. It helps remind me, yeah.</p>

Page 273	Page 275
<p>1 Q. So you think that Ms. Barbounis broke the 2 law because she didn't tell you about \$7,500? Is 3 that what you think? 4 MR. CAVALIER: I'll object to the form. 5 THE WITNESS: I don't know if it's 6 breaking the law or not. 7 BY MR. CARSON: 8 Q. Well, you sued her and accused her of 9 breaking the law, right? 10 MR. CAVALIER: Again, object to the form. 11 I think you're confusing the difference between 12 criminal law and a civil violation. 13 BY MR. CARSON: 14 Q. Do you know the difference between 15 criminal law and a civil violation? 16 A. I do. 17 Q. So -- sorry. What was your answer? 18 A. I do, yes. 19 Q. You understand that when I say "break the 20 law," I'm -- I've said it many times today. Gregg 21 Roman broke the law when he violated Title VII in 22 the [unintelligible] Philadelphia Fair Practice 23 Ordinance. You're accusing Ms. Barbounis of 24 breaking the law by violating the duty of loyalty.</p>	<p>1 A. Danny Thomas. 2 Q. Do you know whether Danny Thomas actually 3 took the money? 4 A. Yes. We were told. He admitted it. 5 Q. He admitted it? Is that your testimony? 6 A. I believe so. 7 Q. Did he also say whether Gregg Roman 8 offered to pay him money for admitting it? 9 A. He did not say that. 10 MR. CAVALIER: Object to form. 11 BY MR. CARSON: 12 Q. Did you ever listen to a recording where 13 he said that? 14 A. I listened to a recording, and he did not 15 say that. 16 Q. Oh, he didn't? 17 A. He didn't. 18 Q. Do you wanna listen to it right now? 19 A. Sure. 20 --- 21 (Whereupon audio recording was played.) 22 --- 23 BY MR. CARSON: 24 Q. You heard him just say, "So Gregg</p>
Page 274	Page 276
<p>1 Do you understand that? 2 A. Okay. 3 Q. So why do you think Ms. Barbounis 4 violated -- what's her duty of loyalty? What 5 information do you have about that? 6 A. She knew about the theft of the \$7,000 and 7 didn't report it. 8 Q. Why do you think she knew about it? 9 A. Because we have texts between her and 10 others that indicate that. 11 Q. Do you know if \$7,000 was ever really 12 stolen from you? 13 A. We have her text to tell us that as well 14 as other people's information. 15 Q. Have you ever confirmed whether that money 16 was ever really stolen from you? 17 A. It was stolen in the sense that it was 18 meant for one purpose and used for another. 19 --- 20 (Indistinguishable cross-talk.) 21 --- 22 BY MR. CARSON: 23 Q. What purpose was it used -- who stole the 24 money?</p>	<p>1 contacted me," correct? 2 MR. CAVALIER: I'm gonna object to the 3 fact that that sounds incomprehensible to me, 4 but to the extent -- 5 BY MR. CARSON: 6 Q. You heard him just say, "So Gregg 7 contacted me," correct? 8 A. I heard those words spoken. I don't know 9 who spoke them. 10 Q. Okay. 11 --- 12 (Whereupon audio recording was played.) 13 --- 14 BY MR. CARSON: 15 Q. "He gave me a little wink and said, 'When 16 this is all over'" -- "He said, 'Help us do 17 this'" -- so did you ever hear that recording 18 before? 19 MR. CAVALIER: Again, I'm just gonna 20 object to the fact that I find it 21 incomprehensible but -- 22 BY MR. CARSON: 23 Q. Did you ever hear that recording before? 24 A. I did not.</p>

Page 277	Page 279
<p>1 Q. You never listened to that recording 2 before? Do you think it's troubling that he's 3 saying, "I'm gonna fuckin' testify against that 4 cunt"? Like do you think that's credible? 5 A. I have no idea who's speaking, and I don't 6 know what the subject is. 7 Q. I mean, you testify all day about 8 credibility, Mr. Pipes. 9 A. I didn't even understand half of it, so 10 provide a transcript, and let's go over it. 11 Q. We'd be happy -- 12 --- 13 (Indistinguishable cross-talk.) 14 --- 15 THE WITNESS: -- who spoke this and so 16 forth. I have no idea what this is. 17 BY MR. CARSON: 18 Q. Have you ever had a conversation with him? 19 A. With who? 20 MR. CAVALIER: Object to form. 21 BY MR. CARSON: 22 Q. Danny Thomas. 23 A. No. 24 Q. Have you ever asked him to return the</p>	<p>1 --- 2 --- 3 BY MR. CARSON: 4 Q. That's the question. Are you aware of 5 anyone asking for money to be returned? 6 A. No. 7 Q. Mr. Pipes, if Danny Thomas never really 8 stole money, then is there anything that Lisa did 9 wrong? 10 MR. CAVALIER: Object to the hypothetical, 11 lack of foundation. 12 BY MR. CARSON: 13 Q. I mean, it's the basis for your 14 counterclaim is that money was stolen from you, 15 right? 16 A. There are -- I don't know. 17 Q. Well, have you ever seen any evidence that 18 money was stolen from you? 19 A. What do you mean by "evidence"? 20 Q. Have you ever seen any evidence that Danny 21 Thomas actually took money that was donated for a 22 Tommy Robinson campaign and that he spent on 23 something else? Has anyone ever provided evidence 24 of that? MR. CAVALIER: Object to form.</p>
Page 278	Page 280
<p>1 --- 2 money? 3 MR. CAVALIER: Object to form. 4 THE WITNESS: No. 5 BY MR. CARSON: 6 Q. Why -- if you think he stole money from 7 you, why haven't you asked him to return it? 8 A. I have not dealt with the specifics of 9 this. Gregg has. You have to ask him. 10 Q. Nobody's asked him to return the money, 11 though, right? 12 MR. CAVALIER: Object to form. 13 THE WITNESS: All I can tell you is that I 14 did not authorize any payment of money to Danny 15 Thomas, and I would not. It's -- 16 MR. CARSON: You have to speak up. Can 17 you hear him, because I can't hear him at all. 18 THE COURT REPORTER: It's very quiet. 19 MR. CARSON: I mean, you just -- 20 Mr. Pipes, we're doing this on a video 21 recording, so you just gotta make it so we can 22 hear you, man. Can you read the last question? 23 --- 24 (Whereupon the court reporter read back the pertinent testimony.)</p>	<p>1 --- 2 BY MR. CARSON: 3 Q. What was that evidence? 4 A. The many texts going back and forth 5 between him and Lisa, maybe others, about this 6 misappropriated money. 7 Q. Are you talking about the texts where he 8 says, I never stole money? 9 MR. CAVALIER: Object to form. 10 THE WITNESS: No. I'm talking about where 11 they discussed the money that he had taken that 12 was meant for other purposes. 13 BY MR. CARSON: 14 Q. You saw text messages where Danny Thomas 15 and Lisa Barbounis discussed money that Danny Thomas 16 stole? 17 A. Yes. 18 Q. Really? 19 A. I believe so. 20 Q. What did they say? 21 A. I don't memorize these things. I'm sure 22 we can produce it for you quickly enough. 23 Q. I would love to see those text messages. 24 You saw text messages where Danny Thomas and Lisa are talking about seven -- how much was it that was</p>



Page 281	Page 283
<p>1 supposedly stolen?</p> <p>2 A. \$7,000.</p> <p>3 Q. You saw text messages where they're</p> <p>4 talking about \$7,000, and they both are agreeing</p> <p>5 that he took the money?</p> <p>6 A. I believe so. Be happy to find you the --</p> <p>7 Q. Yeah, no. Please, I would ask, if you</p> <p>8 have those text messages, I'd ask you to please</p> <p>9 produce them.</p> <p>10 A. Okay.</p> <p>11 Q. Because I've never seen a text message</p> <p>12 like that.</p> <p>13 A. Okay.</p> <p>14 Q. I'll move on. Is that the only basis of</p> <p>15 your counterclaim is this \$7,000?</p> <p>16 MR. CAVALIER: Object to the form and the</p> <p>17 characterization of the counterclaim.</p> <p>18 MR. CARSON: I'm asking what the basis of</p> <p>19 it is.</p> <p>20 MR. CAVALIER: You're asking him what the</p> <p>21 basis of the counterclaim is. That involves</p> <p>22 all kinds of legal conclusions and analysis.</p> <p>23 If you wanna --</p> <p>24 ---</p>	<p>1 \$7,000?</p> <p>2 MR. CAVALIER: Gonna object as asked and</p> <p>3 answered.</p> <p>4 THE WITNESS: Provide me the documents,</p> <p>5 and I will then tell you -- give you an answer,</p> <p>6 but I can't --</p> <p>7 BY MR. CARSON:</p> <p>8 Q. What document should I provide you that</p> <p>9 will help you answer that question?</p> <p>10 A. Counterclaim. Provide me with the</p> <p>11 counterclaim.</p> <p>12 Q. It's your counterclaim.</p> <p>13 A. Right, but I --</p> <p>14 Q. You want me to show you your counterclaim</p> <p>15 so you can answer a question about your</p> <p>16 counterclaim?</p> <p>17 A. I did not memorize it. It's a long,</p> <p>18 complicated document with many legal aspects which I</p> <p>19 cannot recite to you.</p> <p>20 Q. So, sitting here right now, you don't know</p> <p>21 of any other basis for the counterclaim other than</p> <p>22 the 7,000 --</p> <p>23 MR. CAVALIER: Object to form. Object to</p> <p>24 the miscategorization of testimony. He's</p>
Page 282	Page 284
<p>1 ---</p> <p>2 (Indistinguishable cross-talk.)</p> <p>3 BY MR. CARSON:</p> <p>4 Q. Is there any other reason why you decided</p> <p>5 to make a counterclaim against Lisa Barbounis other</p> <p>6 than the \$7,000 that --</p> <p>7 MR. CAVALIER: Object to form. Are you</p> <p>8 talking about just the breach of fiduciary duty</p> <p>9 claim, or you talking about the other</p> <p>10 counterclaim?</p> <p>11 BY MR. CARSON:</p> <p>12 Q. All of them. Is there any other claims?</p> <p>13 Are any of them based on anything other than the</p> <p>14 \$7,000?</p> <p>15 A. It's a long document that I have not</p> <p>16 memorized, so if you want me to go back and review</p> <p>17 it, I --</p> <p>18 ---</p> <p>19 (Indistinguishable cross-talk.)</p> <p>20 ---</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Testify to the best of your knowledge</p> <p>23 right now. To your knowledge, is there any other</p> <p>24 basis for any of the counterclaims other than the</p>	<p>1 answered the question to the best of his</p> <p>2 ability, Seth.</p> <p>3 MR. CARSON: Actually, he hasn't.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. But just clear it up. Sitting here right</p> <p>6 now, without looking at the counterclaim, without</p> <p>7 reading it, do you know of any other basis for the</p> <p>8 counterclaim other than the \$7,000?</p> <p>9 A. Sitting here --</p> <p>10 MR. CAVALIER: Object to form.</p> <p>11 THE WITNESS: I'm not gonna be trapped by</p> <p>12 you.</p> <p>13 BY MR. CARSON:</p> <p>14 Q. It's not a trap.</p> <p>15 A. Let me finish --</p> <p>16 Q. Your lawyer entered his objection. Just</p> <p>17 answer the question, yes or no. It's simple. We</p> <p>18 can move on.</p> <p>19 A. Sitting here right now, I am not gonna be</p> <p>20 trapped by you into giving an incomplete version of</p> <p>21 the counterclaim. It's in black and white. I can</p> <p>22 read it, I can bone up on it, I can recite it to</p> <p>23 you, but I can't do it for you right now. I'm</p> <p>24 focused on the timeline of what happened, and that's</p>

Page 285	Page 287
<p>---</p> <p>1 what I can speak about with confidence. The</p> <p>2 counterclaim I'm not prepared to talk about.</p> <p>3 Q. Lisa Barbounis had your permission to work</p> <p>4 with Tommy Robinson, correct, on her own time?</p> <p>5 MR. CAVALIER: Object to form.</p> <p>6 THE WITNESS: When?</p> <p>7 MR. CAVALIER: -- date range on that?</p> <p>8 BY MR. CARSON:</p> <p>9 Q. Anytime. She had your permission at</p> <p>10 sometime in your life to work with Tommy Robinson?</p> <p>11 A. Until she abused it, yes.</p> <p>12 Q. You said to her, you can do what you want</p> <p>13 on your own time, right?</p> <p>14 A. Until she abused that, and then I took it</p> <p>15 away.</p> <p>16 Q. You actually said to her, I'm hesitant to</p> <p>17 tell you what to do on your own time. You can do</p> <p>18 what you like, right?</p> <p>19 A. Until she abused that, and I took it away.</p> <p>20 Q. Is there any basis -- is there any policy</p> <p>21 in the Middle East Forum maintained that an employee</p> <p>22 of the Middle East Forum isn't allowed to have a</p> <p>23 second job?</p> <p>24 A. No, but there is a policy that we cannot</p>	<p>---</p> <p>1 THE WITNESS: She appeared in photographs</p> <p>2 and in other media in Britain being part of the</p> <p>3 Tommy Robinson campaign. They didn't care</p> <p>4 whether she was paid or not, and I don't care</p> <p>5 if she was paid or not. I care --</p> <p>6 BY MR. CARSON:</p> <p>7 Q. I can't hear you.</p> <p>8 A. It didn't matter that she was paid or not.</p> <p>9 It mattered that she was portrayed in British</p> <p>10 media -- prominent British media -- as part of the</p> <p>11 Tommy Robinson campaign.</p> <p>12 Q. But at the time that those pictures were</p> <p>13 taken, she did have your permission to be there,</p> <p>14 right?</p> <p>15 A. She had my permission to be there. She</p> <p>16 did not have my permission to be engaged in the</p> <p>17 campaign and to be publicly associated with the</p> <p>18 campaign as a Middle East Forum employee.</p> <p>19 Q. Right, but she did have your permission to</p> <p>20 do that on her own time at that time?</p> <p>21 MR. CAVALIER: Object to form.</p> <p>22 THE WITNESS: I don't know which time</p> <p>23 you're speaking about --</p> <p>24 ---</p>
Page 286	Page 288
<p>---</p> <p>1 be involved in politics, and when British media</p> <p>2 portray a Middle East Forum employee as working on</p> <p>3 the Tommy Robinson campaign, red lights go off all</p> <p>4 over the place, and I had to stop that.</p> <p>5 Q. So -- but she's allowed to work on</p> <p>6 politics as long as it's not related to her job at</p> <p>7 the Middle East Forum, right?</p> <p>8 A. That was the initial point. Later, I said</p> <p>9 you gotta stop it entirely because you've crossed</p> <p>10 the line.</p> <p>11 Q. And after you said that she has to --</p> <p>12 well, when did you say she has to stop it entirely?</p> <p>13 A. You have the dates. Sometime --</p> <p>14 Q. You know when?</p> <p>15 A. I don't remember the exact date, but in</p> <p>16 the spring of 2019.</p> <p>17 Q. Do you know if she ever was paid by Tommy</p> <p>18 Robinson?</p> <p>19 A. I do not.</p> <p>20 Q. Sorry? I didn't hear you.</p> <p>21 A. No, I don't know.</p> <p>22 Q. She just did some volunteer work for the</p> <p>23 guy, right?</p> <p>24 MR. CAVALIER: Object to form.</p>	<p>---</p> <p>1 (Indistinguishable cross-talk.)</p> <p>2 ---</p> <p>3 THE WITNESS: -- I don't remember</p> <p>4 [inaudible] was before or after, but,</p> <p>5 initially, she had it, and then I took it away.</p> <p>6 BY MR. CARSON:</p> <p>7 Q. But the problem you had with her is that</p> <p>8 her picture was taken, and you were worried about</p> <p>9 the exposure it might have or the blowback it might</p> <p>10 have on the Middle East Forum, correct?</p> <p>11 A. No.</p> <p>12 Q. Okay. Then what were you worried about?</p> <p>13 A. Legal consequences.</p> <p>14 Q. The blowback, the -- aren't we saying the</p> <p>15 same thing, Mr. Pipes?</p> <p>16 A. I don't know what "blowback" means. I</p> <p>17 know that this is legally unacceptable for us to --</p> <p>18 Q. Blowback, consequences, repercussions.</p> <p>19 All means the same thing. So would you like me to</p> <p>20 use the word "consequences"? Were you worried about</p> <p>21 the consequences that her picture in the paper might</p> <p>22 have? I think it was The Guardian, correct?</p> <p>23 A. I believe so.</p> <p>24 Q. So you were worried about the consequences</p>

Page 289	Page 291
<p>---  1 that picture might have on the Middle East Forum; is  2 that right?  3 A. Correct.  4 Q. But at the time that picture was taken,  5 she did have your permission to work with him on her  6 own time, right?  7 A. I'm not sure.  8 Q. Did you fire her after that?  9 A. I never fired her.  10 Q. Sorry?  11 A. I never fired her.  12 Q. Right. You knew that the picture was  13 taken, you talked to her about it, and she continued  14 her employment thereafter, correct?  15 A. She continued her employment, and then she  16 continued her working with Tommy Robinson against my  17 wishes.  18 Q. But are you --  19 A. -- so far as to lie to me -- let me  20 finish. She went so far as to lie to me that she  21 took her children to Britain when she didn't, and  22 then she lied further and pretended that I'd agreed  23 with her and connived with her to say that she'd  24 taken her children to Britain when she --</p>	<p>---  1 ---  2 (Indistinguishable cross-talk.)  3 ---  4 THE WITNESS: No. She lied to me. The  5 first time she -- let me finish. The first lie  6 was to tell me that she went to Britain with  7 her children, and her second lie was to tell,  8 subsequently, that I agreed to that lie, that I  9 was in on that lie with her.  10 BY MR. CARSON:  11 Q. Well, maybe she thought you knew that she  12 wasn't there with her kids, right?  13 A. Didn't know that. She knew that she lied  14 to me about taking her children, and then she  15 pretended that I had agreed to that lie, that I  16 connived in that lie with her, that I was party to  17 that lie, so a double lie. First, the children, and  18 then my agreements. Lies, lies, lies. Your clients  19 tell lies, Mr. Carson.  20 Q. Mr. Pipes, have you counted the number of  21 inconsistencies in your testimony today?  22 MR. CAVALIER: Object to form. Daniel,  23 you don't have to answer that.  24 BY MR. CARSON:</p>
Page 290	Page 292
<p>---  1 Q. We can't hear you.  2 A. -- when I had --  3 MR. CARSON: Can you hear him?  4 THE COURT REPORTER: Little bit.  5 BY MR. CARSON:  6 Q. Mr. Pipes, it's really hard to hear you  7 today. Like you have to just speak up and talk  8 loud. I don't know what else to tell you. It's  9 literally almost impossible to hear what you're  10 saying. You were talking about a picture that was  11 taken, and then you were talking about Ms. Barbounis  12 telling you that she was there with her kids, right?  13 A. Right.  14 Q. Yes?  15 A. Yes.  16 Q. Okay. So wasn't she telling you that to  17 give the Middle East Forum cover to help the Middle  18 East Forum?  19 MR. CAVALIER: Object to form.  20 THE WITNESS: No.  21 BY MR. CARSON:  22 Q. Because you were worried about her being  23 there and associated with the Middle East Forum, she  24 was saying, hey, I was just there with my kids?</p>	<p>---  1 Q. You don't have to answer that, but I'd be  2 careful telling other people that they're lying. So  3 let's just keep going. Speaking of lies -- all  4 right. So let's look at a document that's dated --  5 it's gonna be 21 and 22 and 23, all right? And I  6 forgot we're on a screen share, so that's all the  7 discovery. All right. So 22, 23. All right,  8 ready? Here is Document No. 22. Do you see when  9 this email was sent? It was -- here's a date right  10 here.  11 A. Yep.  12 Q. That's after November 5th, 2018, right?  13 A. Right.  14 Q. It's afterwards, right? And it's from  15 Tricia to you, correct?  16 A. Yup.  17 Q. You wanna take a minute and read this?  18 A. Okay. Okay.  19 Q. So these are complaints about Gregg Roman  20 made after November 5th, 2018, correct?  21 A. Correct.  22 Q. Didn't you testify there were none?  23 A. Correct.  24 Q. Didn't you specifically testify there were</p>

Page 293	Page 295
<p>---  1 absolutely none from Tricia McNulty?  2 A. Right.  3 Q. Okay. Well, let's start counting, then,  4 since we're gonna talk about this next. So number  5 one would be the April 23rd, 2019 email from  6 McNulty, okay? And this email actually has a lot of  7 complaints in it; it's not just one complaint,  8 right?  9 A. Yep.  10 Q. It talks about a complaint that Marnie  11 made. It talks about a complaint that Caitriona  12 Brady made, right?  13 A. Right.  14 Q. So what did you do about this? Did you  15 investigate this?  16 A. Yes.  17 Q. Did you fire Gregg Roman?  18 A. No.  19 Q. Why not?  20 A. Why should I?  21 Q. I don't know. Maybe because retaliation  22 is against the law, correct?  23 MR. CAVALIER: Object to form. You don't  24 have to answer that if you don't want to.</p>	<p>---  1 A. I don't know.  2 Q. Don't you find it a little disturbing that  3 when Gregg Roman doesn't know who the person is  4 who's alleging the harassment, he guesses and gets  5 it wrong?  6 MR. CAVALIER: Object to form. Object to  7 the mis --  8 BY MR. CARSON:  9 Q. How many women does someone have to harass  10 where, when someone accuses them of harassment, they  11 can't even guess the right person?  12 MR. CAVALIER: Object to form. Object as  13 argumentative. Daniel, I don't even know if  14 that's an actual question, but, to the extent  15 it is, you don't have to answer it --  16 BY MR. CARSON:  17 Q. It's at least two, right? Can't be one,  18 correct?  19 MR. CAVALIER: Object because I don't  20 understand what the question is.  21 BY MR. CARSON:  22 Q. Right. In order to not know who the  23 person is making the allegation of harassment, you'd  24 have to harass multiple people; is that right?</p>
Page 294	Page 296
<p>---  1 BY MR. CARSON:  2 Q. Retaliation is against the law, right? Do  3 you know it's against the law?  4 A. I don't see retaliation.  5 Q. Well, if Gregg Roman is responding to all  6 the reports of discrimination and harassment by  7 subjecting the women who made the reports to further  8 harassment, that would be retaliation, correct?  9 MR. CAVALIER: Object to the hypothetical.  10 Object to --  11 BY MR. CARSON:  12 Q. That your understanding of what  13 retaliation is?  14 A. Hypothetical.  15 MR. CAVALIER: Same objections.  16 BY MR. CARSON:  17 Q. Well, tell me your understanding of  18 retaliation.  19 A. I'm not a legal specialist.  20 Q. Okay. But do you understand that  21 retaliation is against the law?  22 A. Yes.  23 Q. And does MEF have a policy prohibiting  24 retaliation?</p>	<p>---  1 MR. CAVALIER: Object to the hypothetical.  2 Object to form.  3 MR. CARSON: You can answer.  4 MR. CAVALIER: Object as argumentative.  5 BY MR. CARSON:  6 Q. Go ahead. You can answer.  7 A. I don't know the law.  8 THE COURT REPORTER: What was that, sir?  9 THE WITNESS: I don't know the law in  10 detail.  11 BY MR. CARSON:  12 Q. Mr. Pipes, who's Gabrielle Bloom?  13 A. I don't know.  14 Q. Well, did you check to see whether money  15 was paid to her?  16 A. I investigated this at the time.  17 Q. Did you find that money was paid to her  18 from the Middle East Forum?  19 A. I don't remember.  20 Q. You don't know whether money was paid to  21 her?  22 MR. CAVALIER: Object to form.  23 BY MR. CARSON:  24 Q. Was it hush money?</p>



Page 297	Page 299
<p>---</p> <p>1 A. I did not authorize any money going to</p> <p>2 Gabrielle Bloom.</p> <p>3 Q. How much money got paid to her?</p> <p>4 MR. CAVALIER: Object to form. That's not</p> <p>5 what he said.</p> <p>6 BY MR. CARSON:</p> <p>7 Q. How much money did MEF issue to Ms. Bloom</p> <p>8 that wasn't on a W-2?</p> <p>9 MR. CAVALIER: Object to form.</p> <p>10 THE WITNESS: I know of no such money.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. Sorry?</p> <p>13 A. I know of no such money.</p> <p>14 Q. Well, you did say that you investigated</p> <p>15 whether money went to her, correct?</p> <p>16 A. I don't remember any money going to her.</p> <p>17 Q. My question was, did you investigate</p> <p>18 whether the Middle East Forum issued money to</p> <p>19 Gabrielle Bloom?</p> <p>20 A. I looked into it and did not find any</p> <p>21 money.</p> <p>22 Q. Did you ever try to call Gabrielle Bloom</p> <p>23 to talk to her?</p> <p>24 A. She did not contact me to complain, so,</p>	<p>---</p> <p>1 Daniel. Object to form. Object, lack of</p> <p>2 foundation. Object, argumentative.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. I didn't try to create a foundation.</p> <p>5 Whether true or not, that's ten women's names who</p> <p>6 could possibly be linked to harassment by Gregg</p> <p>7 Roman, right?</p> <p>8 MR. CAVALIER: Question you're asking him</p> <p>9 is, did you just name ten people?</p> <p>10 BY MR. CARSON:</p> <p>11 Q. Yes. Did I just name ten women?</p> <p>12 A. Yes, and I congratulate you on finding all</p> <p>13 these different women to --</p> <p>14 Q. Right, and [unintelligible] --</p> <p>15 ---</p> <p>16 (Indistinguishable cross-talk.)</p> <p>17 ---</p> <p>18 THE WITNESS: Let me finish.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. I said, did I name ten women? That was</p> <p>21 the question. You said yes.</p> <p>22 A. But I get to answer the way I want to</p> <p>23 answer.</p> <p>24 Q. No, actually, you don't.</p>
Page 298	Page 300
<p>---</p> <p>1 no.</p> <p>2 Q. That's part of your policy where you won't</p> <p>3 investigate anything unless [inaudible] comes to you</p> <p>4 first, correct?</p> <p>5 MR. CAVALIER: Object to form.</p> <p>6 THE WITNESS: My concern here, as in other</p> <p>7 cases, was the welfare of the employees who</p> <p>8 worked with me -- in this case, Marnie, Matt</p> <p>9 Bennett, and Tricia McNulty -- and that's who I</p> <p>10 focused on.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. Aren't you concerned when there is --</p> <p>13 let's just count it now, right? There's Patricia</p> <p>14 McNulty, right; there's Lisa Barbounis; there's Lea</p> <p>15 Merville; there's Delaney Yonchek; there's Caitriona</p> <p>16 Brady; there's Marnie Meyer; there's Tiffany Lee;</p> <p>17 there's Laura Frank; there's Lara -- we don't know</p> <p>18 her last name -- and now there's Gabrielle Bloom;</p> <p>19 one, two, three, four, five, six, seven, eight,</p> <p>20 nine -- ten women who might have been harassed by</p> <p>21 Gregg Roman by this point. Whether true or not,</p> <p>22 that's ten women who may have been harassed by him,</p> <p>23 correct?</p> <p>24 MR. CAVALIER: Object to form. Hold on,</p>	<p>---</p> <p>1 A. You can't stop me.</p> <p>2 Q. I asked you if that was ten. Do you wanna</p> <p>3 expand on your answer of whether ten equals ten? Go</p> <p>4 ahead. Tell me what you have to say about the</p> <p>5 number ten.</p> <p>6 A. [Inaudible]. Very kind of you to allow me</p> <p>7 to speak.</p> <p>8 Q. Go ahead, go ahead.</p> <p>9 A. Yes, and I congratulate you on [inaudible]</p> <p>10 bring up against the Forum and Gregg. It was --</p> <p>11 Q. We can't hear you.</p> <p>12 THE COURT REPORTER: Yeah. Can you start</p> <p>13 your answer again, please, Mr. Pipes?</p> <p>14 BY MR. CARSON:</p> <p>15 Q. We can't hear you at all.</p> <p>16 A. I said fine work, Mr. Carson, on finding</p> <p>17 ten women to name as you just did.</p> <p>18 Q. That's your answer?</p> <p>19 A. That's my answer.</p> <p>20 Q. You're welcome. Thank you for saying fine</p> <p>21 work. But the point, Mr. Pipes, is that this is ten</p> <p>22 names that you are now in possession of. By</p> <p>23 April 23rd, 2019, you had all ten of these women's</p> <p>24 names in front of you, right?</p>

Page 301	Page 303
<p>1 A. I'm not sure.</p> <p>2 Q. Sorry?</p> <p>3 A. I'm not sure. I haven't counted them.</p> <p>4 Q. Well, you definitely had Gabrielle Bloom's</p> <p>5 name in front of you, right?</p> <p>6 A. Right.</p> <p>7 Q. Yeah?</p> <p>8 A. Yeah.</p> <p>9 Q. You had Caitriona Brady's name in front of</p> <p>10 you. That name's in this email, correct?</p> <p>11 A. Right.</p> <p>12 Q. You had --</p> <p>13 A. Well, no, no, no. There was no allegation</p> <p>14 against -- by Caitriona against Gregg, no.</p> <p>15 Q. You don't think she's upset that Gregg</p> <p>16 Roman is telling people that her dad and her boss</p> <p>17 had sex?</p> <p>18 A. She was upset but --</p> <p>19 MR. CAVALIER: I think you mis -- I think</p> <p>20 you mischaracterized the rumor.</p> <p>21 MR. CARSON: Yeah, no. It's worse than</p> <p>22 what I said. It's that Marnie Meyer got her</p> <p>23 job because her dad had sex with her.</p> <p>24 MR. CAVALIER: I think you still got the</p>	<p>1 A. No, she's not.</p> <p>2 Q. That's not inappropriate conduct to spread</p> <p>3 a rumor about someone's father having sex? Nothing</p> <p>4 wrong with that?</p> <p>5 A. I thought your list was --</p> <p>6 MR. CAVALIER: Object to form.</p> <p>7 THE WITNESS: -- women who allege that</p> <p>8 Gregg had misbehaved with.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. Oh. Well, if you want that list, that's</p> <p>11 fine. We can take two names off, so now we have</p> <p>12 eight women who said that. So you wanna do that?</p> <p>13 I'm fine with doing that. Let's take off Delaney</p> <p>14 Yonchek, and let's take off Caitriona Brady. So now</p> <p>15 there's eight women by April of 2019 who allege</p> <p>16 sexual misconduct, right, and you're aware of all of</p> <p>17 them by April 2019, right?</p> <p>18 MR. CAVALIER: Object to form. Object to</p> <p>19 lack of foundation.</p> <p>20 THE WITNESS: I'm aware of what exactly?</p> <p>21 BY MR. CARSON:</p> <p>22 Q. That there's eight women who potentially</p> <p>23 were harassed by Gregg Roman by April of 2019,</p> <p>24 sexually --</p>
Page 302	Page 304
<p>1 parties a little mixed up, but, Daniel, if you</p> <p>2 can answer the question, go ahead.</p> <p>3 ---</p> <p>4 (Indistinguishable cross-talk.)</p> <p>5 ---</p> <p>6 BY MR. CARSON:</p> <p>7 Q. Caitriona Brady's dad and Marnie Meyer</p> <p>8 having sex is the rumor.</p> <p>9 A. Caitriona did not allege, until you got</p> <p>10 your hands on her, that Gregg did anything against</p> <p>11 her --</p> <p>12 Q. -- sent this email. I didn't talk to them</p> <p>13 in April 2019.</p> <p>14 A. Show me in the email where Caitriona says</p> <p>15 that Gregg did something sexually inappropriate with</p> <p>16 Caitriona.</p> <p>17 Q. That's not what I said.</p> <p>18 A. What did you say?</p> <p>19 Q. I said that Caitriona Brady is upset that</p> <p>20 Gregg is talking about her father and Marnie Meyer</p> <p>21 having sex.</p> <p>22 A. Agreed on that, but what is the list of --</p> <p>23 how do you --</p> <p>24 Q. Well, Caitriona's one of them, right?</p>	<p>1 A. Where does it say that Gabrielle Bloom was</p> <p>2 sexually harassed?</p> <p>3 Q. "I received a phone call from Matt Bennett</p> <p>4 last night. He started the conversation with</p> <p>5 pleasantries, but then began to discuss current MEF</p> <p>6 internal operations. He is apparently speaking to</p> <p>7 Gregg every two days, knew that Gary was back, and</p> <p>8 also that Marnie had made another allegation against</p> <p>9 Gregg, which Gregg was very upset about because he</p> <p>10 didn't know what the allegation was. They were</p> <p>11 apparently concerned that Marnie might have gone out</p> <p>12 to find an old intern by the name of Gabrielle</p> <p>13 Bloom. The story there, as I was told, was that</p> <p>14 Gabrielle Bloom would be able to testify about a</p> <p>15 personal relationship with Gregg Roman." Right?</p> <p>16 A. Do I hear anything here about sexual</p> <p>17 misbehavior?</p> <p>18 Q. That's not the point, Mr. Pipes. The</p> <p>19 point is you were in possession of another name that</p> <p>20 you could've investigated.</p> <p>21 MR. CAVALIER: Object to form.</p> <p>22 THE WITNESS: -- investigating that Gregg</p> <p>23 may or may not have had sexual relationship</p> <p>24 with Gabrielle Bloom. Any --</p>

Page 305	Page 307
<p>1                   - - -</p> <p>2                   - - -</p> <p>3                   - - -</p> <p>4                   - - -</p> <p>5                   - - -</p> <p>6                   - - -</p> <p>7                   - - -</p> <p>8                   - - -</p> <p>9                   - - -</p> <p>10                  - - -</p> <p>11                  - - -</p> <p>12                  - - -</p> <p>13                  - - -</p> <p>14                  - - -</p> <p>15                  - - -</p> <p>16                  - - -</p> <p>17                  - - -</p> <p>18                  - - -</p> <p>19                  - - -</p> <p>20                  - - -</p> <p>21                  - - -</p> <p>22                  - - -</p> <p>23                  - - -</p> <p>24                  - - -</p>	<p>1                   - - -</p> <p>2                   - - -</p> <p>3                   - - -</p> <p>4                   - - -</p> <p>5                   - - -</p> <p>6                   - - -</p> <p>7                   - - -</p> <p>8                   - - -</p> <p>9                   - - -</p> <p>10                  - - -</p> <p>11                  - - -</p> <p>12                  - - -</p> <p>13                  - - -</p> <p>14                  - - -</p> <p>15                  - - -</p> <p>16                  - - -</p> <p>17                  - - -</p> <p>18                  - - -</p> <p>19                  - - -</p> <p>20                  - - -</p> <p>21                  - - -</p> <p>22                  - - -</p> <p>23                  - - -</p> <p>24                  - - -</p>
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Page 309	Page 311
<p>---  1 Q. Not that serious.  2 A. It wasn't a murder. I could only go so  3 far to try and figure out who said what. I quizzed  4 Tricia. I quizzed Matt. I quizzed Gregg. I tried  5 to find out who said what to who and when, and I  6 ended up with no resolution. At a certain point, I  7 gave up, as with the other thing, because I was  8 getting such contrary stories. I never imagined a  9 place of work would be such a hotbed of personal --  10 intense personal relations of vulgarity, of  11 backstabbing, and so forth. I was unaware that this  12 was taking place, and when I became aware, as with  13 this note, I did my best to investigate, and I just  14 couldn't track these things down -- who's saying  15 what? Where does the rumor come from? Who actually  16 said what? Is this-and-that making it up? Did  17 Gregg actually say this? Did Tricia exaggerate it?  18 I couldn't figure it out in the end.  19 Q. Do you think Tricia was exaggerating?  20 A. I don't know.  21 Q. Does she sound like she is in this letter?  22 A. I don't know what the actual story was.  23 Q. Well, the only -- everyone is saying the  24 same thing but Gregg, though, right? It's basically</p>	<p>---  1 A. Let me finish. Don't characterize --  2 don't put words in my mouth.  3 Q. Is that what you're saying? Was it --  4 A. Let me finish. Why do you continuously  5 interrupt me?  6 Q. Mr. Pipes, I asked you another yes or no  7 question. You go on and on and on, and you're not  8 answering the question that we're asking, but go  9 ahead. Take your time. Tell us why -- why you --  10 why you accept Gregg's word every time he denies it.  11 MR. CAVALIER: Object to form.  12 THE WITNESS: You are mischaracterizing  13 what I just said. I did not --  14 BY MR. CARSON:  15 Q. It was just a question.  16 A. Well, it's a "when did you stop beating  17 your wife" question. No, I can't answer that  18 question. I'm not gonna answer that question. The  19 question is, why do you always accept Gregg's word?  20 No, I don't accept Gregg's word. I --  21 Q. Just give me an example [inaudible] --  22 A. I am giving you an example. I made two  23 inquiries into the two issues here, one about  24 Gabrielle Bloom, and one about the rumor. In both</p>
Page 310	Page 312
<p>---  1 everyone accusing Gregg of doing something, Gregg  2 denies it, and you accept Gregg's word every time.  3 That's the pattern, right?  4 MR. CAVALIER: Object to form.  5 Argumentative.  6 BY MR. CARSON:  7 Q. It's not argumentative. Is that the  8 pattern?  9 A. No, it's not the pattern. I did not  10 accept Gregg's word. I --  11 Q. When haven't you accepted his word? Give  12 me an example of when you haven't.  13 A. Let me finish.  14 THE COURT REPORTER: Guys, I'm not getting  15 much, just so you know.  16 THE WITNESS: I did not accept Gregg's  17 word. I found contradictory. I did not  18 endorse Gregg at expense of the others. I did  19 not endorse the others at Gregg's expense. I  20 came away unable to discern the truth, and, as  21 it wasn't a matter of enormous import, but  22 rather backstabbing going on --  23 BY MR. CARSON:  24 Q. It was minor.</p>	<p>---  1 cases, I came up against contradictory  2 information -- what Marnie was saying, what Lisa was  3 saying, what Gregg was saying in the first case,  4 what Gregg was saying, what Matt was saying, what  5 Tricia was saying in the second case -- were all  6 different. As this was not an issue that was  7 potentially a fireable issue, as this was not --  8 this was staff gunning for -- gunning for Gregg's  9 job, disliking each other, allying with each other,  10 at a certain point, I threw up my hands in disgust  11 with this office environment and tried to tell them  12 to just deal with their work and stop this intense  13 interpersonal relations between the staff and stop  14 this already.  15 Q. So it's your testimony that you spoke to  16 Matt, Lisa, Tricia, and Gregg in connection with  17 this incident?  18 A. Which incident?  19 Q. The one that you just said, what Matt was  20 saying, what Lisa was saying, what Gregg was saying,  21 what -- you know, what Tricia saying. So did you --  22 you spoke to them all again after this email?  23 A. I can't tell you exactly who I spoke to in  24 every single case, but I went around and tried to</p>



Page 313	Page 315
<p>---</p> <p>1 collect information from the pertinent staff about 2 what was going on, and I could not figure it out. 3 This was not the case as of November of a lot of 4 people coming and saying roughly the same thing and 5 my taking action on it. This was a mess of 6 contradictions between virtually every person that 7 came to me. Disagreement on almost every topic. 8 Q. Tricia closes by saying, "I know that 9 everyone is concerned that Gregg is back to his old 10 ways, but I truly wanted to believe that he had 11 learned a lesson. The things I was told last night 12 make me believe otherwise," right? I read that 13 correctly? 14 A. You did. 15 Q. So did you do another investigation to 16 determine whether Gregg was back to his old ways? 17 A. What are his old ways? His old ways -- 18 Q. I think she's referencing the things that 19 got him thrown out of the office, no? 20 A. This -- frankly, I think Matt, who left -- 21 Matt -- we haven't talked about Matt. Matt's a good 22 man, but he had a difficult time, as explained the 23 other day in his deposition, and he wanted to be 24 director, and he was angry at Gregg way back in</p>	<p>---</p> <p>1 think Matt had various issues and had affections for 2 some and anger at others and was -- mind you, back 3 then, he was purveying all sorts of information, 4 some of it true, some of it not true. 5 Q. So you're [inaudible] that Matt lied? 6 A. Let me finish. 7 Q. Is that your conclusion, that Matt lied? 8 A. No, I'm not concluded. I'm talking. Man, 9 you're so impolite. I concluded -- 10 Q. This isn't a conversation, Mr. Pipes. 11 It's a question and answer session -- 12 MR. CAVALIER: I'll tell you what, I'm 13 gonna ask for a break while there's no question 14 pending because I need one. 15 MR. CARSON: There is no question pending, 16 and you're client's just waxing poetic. 17 MR. CAVALIER: Well, that's even better. 18 If there's no question pending, we can take a 19 break. 20 MR. CARSON: Perfectly fine. 21 THE VIDEOGRAPHER: All right. So both 22 counsels agree to a break and -- 23 MR. CARSON: -- Jon, maybe you could just 24 have a conversation with your client about</p>
Page 314	Page 316
<p>---</p> <p>1 November. He was -- he wanted to be director. He 2 was annoyed with me for not making him director. I 3 told him on many occasions that he had a year in 4 which to prove himself, from November to November, 5 '18 to '19. Let him show me what he can do, and I 6 will consider it. By March, he had decided he 7 didn't wanna do that anymore. He was fed up. He 8 was displeased. He started all sorts of rumors. 9 [Inaudible]. The day he left, he gave me a call and 10 told me that Marnie wants to be director instead of 11 Gregg. Is it true? Is it not true? I don't know. 12 Did I do an investigation to it? No. These 13 statements, rumors, allegations were zooming all 14 around the place, and I was, on the one hand, very 15 fed up with them; on the other, I could not spend my 16 entire time looking into whether Marnie really does 17 wanna become director or not. I just -- 18 Q. We haven't seen any allegations against 19 Matt, only Gregg Roman. 20 MR. CAVALIER: Object to form. 21 BY MR. CARSON: 22 Q. Right? Why do you think Matt Bennett's 23 the problem, not Gregg Roman? 24 A. I think I just explained to you why I</p>	<p>---</p> <p>1 quickly getting through this. 2 --- 3 (Indistinguishable cross-talk.) 4 --- 5 THE COURT REPORTER: Luke, what time is 6 it? 7 THE VIDEOGRAPHER: The time is 4:49, and 8 we are off the record. 9 --- 10 (Whereupon there was a recess in the 11 proceeding from 4:49 p.m. to 5:08 p.m.) 12 --- 13 THE VIDEOGRAPHER: The time is 5:08 p.m. 14 Eastern Time, and we are now back on the 15 record. 16 BY MR. CARSON: 17 Q. Mr. Pipes, do you see this email to Lisa 18 Barbounis from you sent on June 5th, 2019? 19 A. Yep. 20 Q. You did tell Lisa in this email that she 21 could work on her own time on the Tommy Robinson 22 stuff, correct? 23 A. Yup. 24 Q. Yes?</p>

Page 317	Page 319
<p>---</p> <p>1 A. I did say it, yeah.</p> <p>2 Q. You did say it, yes? We can't hear you.</p> <p>3 Is that what you said?</p> <p>4 A. Yes.</p> <p>5 Q. Do you know that Lisa Barbounis is a</p> <p>6 elected Republican official in Philadelphia?</p> <p>7 A. I learned this in this email. Yes.</p> <p>8 Q. So she is allowed to do political work on</p> <p>9 her own time, correct?</p> <p>10 MR. CAVALIER: Object to form.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. By nature of her being a public-elected</p> <p>13 official, that's political, right?</p> <p>14 A. No.</p> <p>15 Q. No? Being an elected official is not</p> <p>16 political?</p> <p>17 A. Serving as elected official is not</p> <p>18 political. It depends -- I mean, not necessarily.</p> <p>19 Depends what the office is. I don't know what the</p> <p>20 office --</p> <p>21 Q. We can't hear you.</p> <p>22 A. I don't know what her office is. I don't</p> <p>23 know if it's political or not.</p> <p>24 Q. After you found out that she was an</p>	<p>---</p> <p>1 that?</p> <p>2 MR. CAVALIER: Object to form.</p> <p>3 THE WITNESS: No, I don't see that. I see</p> <p>4 where she lied about taking her children to</p> <p>5 Britain.</p> <p>6 BY MR. CARSON:</p> <p>7 Q. You don't see it?</p> <p>8 A. No, I don't. Now I see both. I see --</p> <p>9 Q. "I leave it to your good sense not to get</p> <p>10 entangled in anything MEF issues" [as read]. Do you</p> <p>11 see that?</p> <p>12 MR. CAVALIER: I'm gonna let the record</p> <p>13 reflect that you scrolled the document up so he</p> <p>14 could see the part you were referring to.</p> <p>15 THE WITNESS: Now that you scroll the</p> <p>16 document up, I can see it, and I can also see</p> <p>17 the lie that Lisa told me about taking her</p> <p>18 children with her to the UK.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Right. I think we've already testified</p> <p>21 about that today.</p> <p>22 A. Thank you for pointing it out.</p> <p>23 Q. So on June 5th, 2019 there's an email from</p> <p>24 Marnie Meyer, right?</p>
Page 318	Page 320
<p>---</p> <p>1 elected public official as a Republican, did you</p> <p>2 tell her she had to stop doing that at any time?</p> <p>3 A. [Inaudible].</p> <p>4 Q. I'm sorry. We can't hear you.</p> <p>5 A. Go up, and you have my reply to her.</p> <p>6 Q. Well, I'm just asking, did you ever tell</p> <p>7 her that she had to stop?</p> <p>8 A. Go up, and you'll see my reply.</p> <p>9 Q. I'm not referencing a document. I'm</p> <p>10 asking you a question right now.</p> <p>11 A. I'm referencing a document.</p> <p>12 Q. What?</p> <p>13 A. I'm referencing a document.</p> <p>14 Q. Well, that's not how it works.</p> <p>15 A. Well, you just --</p> <p>16 Q. Did you ever tell Lisa that she had to</p> <p>17 stop being an elected public official as a</p> <p>18 Republican? That's my question. Yes or no? It's</p> <p>19 just a yes or no question.</p> <p>20 A. No.</p> <p>21 Q. And, actually, just to reiterate, on</p> <p>22 June 24th, which is document D000024, you told her,</p> <p>23 "I leave it in your good sense not to get entangled</p> <p>24 in anything related to MEF issues," right? See</p>	<p>---</p> <p>1 A. Yep.</p> <p>2 Q. And she tells you that she's disappointed</p> <p>3 that conditions that were implemented after the</p> <p>4 November 5th meeting with Gregg Roman weren't being</p> <p>5 adhered to, correct?</p> <p>6 A. Wrong.</p> <p>7 Q. Was she disappointed?</p> <p>8 A. There's no reference here to November --</p> <p>9 Q. Wasn't one of the conditions that he</p> <p>10 wouldn't deal with the finances?</p> <p>11 A. He -- his -- in November '18, yes; in</p> <p>12 March '19, no.</p> <p>13 Q. So isn't she upset? "Daniel, I am upset</p> <p>14 by your response due to the fact that you assured me</p> <p>15 that Gregg's continued employment with MEF would not</p> <p>16 involve finances" [as read]. Right? She's</p> <p>17 complaining that the conditions for Gregg Roman's</p> <p>18 continued employment aren't being adhered to.</p> <p>19 That's what she's complaining about; isn't that</p> <p>20 right?</p> <p>21 A. That is correct, but it is not what I told</p> <p>22 her, as I explained above. Removed him from</p> <p>23 day-to-day finances; I did not remove him from the</p> <p>24 audit. I couldn't. There's no one else who can do</p>

Page 321	Page 323
<p>--- 1 it, and I told her that at all times, that Gregg has 2 to do the audit. 3 Q. Document No. 26 is the next document. 4 Document 26 is another email. This one is dated -- 5 so now we have this number, too -- June 10th, 2019. 6 This is an email from Patricia McNulty to you, 7 correct? 8 A. Yes. 9 Q. Wanna take a minute and look at it? 10 A. Okay. 11 Q. This is another complaint made after 12 November 5th, 2018 about Gregg Roman, correct? 13 A. Wrong. 14 Q. It's not? 15 A. No. 16 Q. Okay. So when she says, "We agreed I do 17 not report to Gregg but directly to you, as his 18 continued abusive and deceitful behavior is more 19 than I should have to endure." So she's not 20 complaining about Gregg Roman there? 21 A. No. She's just giving her usual dislike 22 of Gregg at this point. It's not a complaint. Show 23 me a -- 24 Q. Abuse and deceit, that's just normal --</p>	<p>--- 1 THE WITNESS: She's simply repeating what 2 she'd said a couple of days -- weeks before. 3 BY MR. CARSON: 4 Q. Yeah, exactly. She made another complaint 5 weeks before, right? 6 A. Let's go back to that earlier complaint 7 now that you -- 8 Q. We're gonna stay on -- 9 A. No. I'm gonna bring up the other thing. 10 Q. Nope, you're not. 11 A. Yes, I am. 12 MR. CARSON: All right. Then we're gonna 13 go off the record, all right? We're off the 14 record. 15 THE VIDEOGRAPHER: Counsel, do we have an 16 agreement about whether or not we are off the 17 record? 18 MR. CAVALIER: No. I have no idea why 19 we're going off the record. 20 MR. CARSON: Because your client decided 21 that he's gonna stop and look through his own 22 documents. We're not doing that on my time. 23 MR. CAVALIER: I don't remember him saying 24 he wanted to look through other documents.</p>
Page 322	Page 324
<p>--- 1 --- 2 (Indistinguishable cross-talk.) 3 --- 4 BY MR. CARSON: 5 Q. Sorry? 6 A. Show me a complaint. 7 Q. She's saying that he's -- "his continued 8 abusive and deceitful behavior". 9 A. Right. That's -- 10 Q. Aren't you concerned that he's being 11 abusive and deceitful and that it's happening after 12 they reported him for sexual harassment? 13 MR. CAVALIER: Object to form. 14 THE WITNESS: There is no allegation of 15 sexual harassment here. 16 BY MR. CARSON: 17 Q. Do you know what retaliation is? 18 A. I do. 19 Q. It's an allegation of retaliation, right? 20 MR. CAVALIER: Object to form. 21 BY MR. CARSON: 22 Q. Does she have to use a magic word to 23 complain about retaliation? 24 MR. CAVALIER: Object to form.</p>	<p>--- 1 MR. CARSON: What'd he just say? 2 MR. CAVALIER: That he wanted to relate 3 his answer back to the prior complaint -- 4 MR. CARSON: We're not looking at this 5 document right now. We're not looking at 6 previous documents. 7 MR. CAVALIER: I'm not talking about a 8 previous document. He just said -- you asked 9 him a question about this, what you -- 10 --- 11 (Indistinguishable cross-talk.) 12 --- 13 BY MR. CARSON: 14 Q. You ready to continue, Mr. Pipes? 15 A. When you let me speak. 16 Q. There's no question pending. There's 17 nothing for you to say. 18 A. I haven't finished my answer. 19 Q. There's no question pending. 20 A. I didn't finish my answer. 21 Q. There's no question pending, Mr. Pipes. 22 Okay. So we're gonna continue when you're ready. 23 If you're not ready, we're gonna go off the record. 24 Which one do you wanna do?</p>

Page 325	Page 327
<p>1 A. I wanna finish my answer.</p> <p>2 Q. There's no question, Mr. Pipes. What are</p> <p>3 you gonna --</p> <p>4 ---</p> <p>5 (Indistinguishable cross-talk.)</p> <p>6 ---</p> <p>7 MR. CARSON: Look, we're gonna go off the</p> <p>8 record because I'm gonna get up and walk away</p> <p>9 and --</p> <p>10 MR. CAVALIER: Are you withdrawing your</p> <p>11 last question?</p> <p>12 MR. CARSON: There's no question pending.</p> <p>13 He wasn't answering a question.</p> <p>14 MR. CAVALIER: Yes, he was.</p> <p>15 MR. CARSON: All right. What's the</p> <p>16 question pending?</p> <p>17 MR. CAVALIER: You're gonna have to ask</p> <p>18 the court reporter since --</p> <p>19 MR. CARSON: Go ahead. What's the</p> <p>20 question?</p> <p>21 ---</p> <p>22 (Discussion was held off the stenographic</p> <p>23 record.)</p> <p>24 ---</p>	<p>1 it if you can, Daniel.</p> <p>2 THE WITNESS: I don't do legal things.</p> <p>3 I'm a Middle East specialist.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. Do you -- what does someone have to say in</p> <p>6 order for it to be retaliation, in order for them to</p> <p>7 report retaliation? What do they have to say to</p> <p>8 you?</p> <p>9 MR. CAVALIER: Same objection.</p> <p>10 THE WITNESS: Hypothetical.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. Mr. Pipes, you have to answer the</p> <p>13 question. What do they have to say to you?</p> <p>14 A. Hypothetical. I do not know what they</p> <p>15 have to say to me.</p> <p>16 Q. Are you in charge of --</p> <p>17 ---</p> <p>18 (Indistinguishable cross-talk.)</p> <p>19 ---</p> <p>20 THE WITNESS: Let me speak.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Mr. Pipes, you just said you're not</p> <p>23 answering hypothetical. Are you in charge of</p> <p>24 enforcing MEF policy to prohibit discrimination and</p>
Page 326	Page 328
<p>1 THE COURT REPORTER: There's no question.</p> <p>2 MR. CARSON: There's no question pending,</p> <p>3 so what are we doing, Jon?</p> <p>4 MR. CAVALIER: You asked a question</p> <p>5 before --</p> <p>6 MR. CARSON: The court reporter just said</p> <p>7 there's no question pending.</p> <p>8 MR. CAVALIER: If you're acknowledging for</p> <p>9 the record that there's no pending question or</p> <p>10 you withdraw the question, we can --</p> <p>11 MR. CARSON: I'm not withdrawing the</p> <p>12 question because there's no question pending,</p> <p>13 which now I've said it and the court reporter</p> <p>14 said it. So are we ready?</p> <p>15 MR. CAVALIER: So ask the question.</p> <p>16 BY MR. CARSON:</p> <p>17 Q. Are we ready to continue, Mr. Pipes?</p> <p>18 A. If you let me finish my answer.</p> <p>19 Q. There's no question pending, Mr. Pipes.</p> <p>20 There's nothing to be finished. Mr. Pipes, is there</p> <p>21 a magic word that people have to say in order to</p> <p>22 report retaliation?</p> <p>23 MR. CAVALIER: Object to form. Object to</p> <p>24 calling for a legal conclusion. You can answer</p>	<p>1 harassment in the workplace? Is that part of your</p> <p>2 job responsibility?</p> <p>3 A. When?</p> <p>4 Q. Anytime between 2017 and the present. Has</p> <p>5 that been your job responsibility?</p> <p>6 A. When we had someone in charge of human</p> <p>7 resources, no. As the ultimate decision maker, but,</p> <p>8 no --</p> <p>9 Q. Okay. You are the president of the Middle</p> <p>10 East Forum, correct?</p> <p>11 A. Yes.</p> <p>12 Q. So you are, quote, unquote, the ultimate</p> <p>13 decision maker?</p> <p>14 A. Yeah, but I don't --</p> <p>15 Q. So you're aware of whether the Middle East</p> <p>16 Forum maintains a [unintelligible] --</p> <p>17 THE COURT REPORTER: Sorry. Say that</p> <p>18 slower.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Are you aware of whether the Middle East</p> <p>21 Forum maintains a policy to prohibit retaliation?</p> <p>22 A. I am not.</p> <p>23 Q. You're not aware whether they have one?</p> <p>24 A. No.</p>



Page 329	Page 331
<p>---</p> <p>1 Q. Okay. That's fine. So, here, you're not 2 concerned -- when Ms. McNulty says that there's 3 continued abusive and deceitful behavior regarding 4 Gregg Roman, you're not concerned that she might be 5 reporting retaliation, correct, or are you? 6 MR. CAVALIER: Object to form. 7 THE WITNESS: When did I stop beating my 8 wife? I'm not gonna answer those questions. 9 I'm gonna give my answer. 10 BY MR. CARSON: 11 Q. No, you're not. 12 A. I'm going to give you my answer -- 13 Q. If I ask a yes or no question, you don't 14 get to just say whatever you want. That's not the 15 way this works. 16 MR. CAVALIER: Seth, when you load the 17 question, it causes problems for the witness. 18 BY MR. CARSON: 19 Q. I'm asking you, are you concerned, when 20 she reports continued abusive and deceitful 21 behavior, that it implicates retaliation, yes or no? 22 Are you concerned? 23 MR. CAVALIER: Same objection. 24 THE WITNESS: I'm not gonna answer a</p>	<p>---</p> <p>1 retaliation? It's not a difficult question. 2 MR. CAVALIER: That's not a question that 3 you asked before. 4 MR. CARSON: It's a yes or no question. 5 It's simple. 6 MR. CAVALIER: That's a different 7 question -- 8 --- 9 (Indistinguishable cross-talk.) 10 --- 11 BY MR. CARSON: 12 Q. Yes or no, Mr. Pipes, were you concerned? 13 MR. CAVALIER: You can answer that 14 question, Daniel. 15 THE WITNESS: No. 16 BY MR. CARSON: 17 Q. How about when she said, "It's more than I 18 should have to endure"? Were you concerned about 19 that? 20 A. No, and I'll tell you why I was wasn't. 21 Q. You don't have to. It was a yes or no 22 question. 23 A. I'm going to. 24 Q. I didn't ask you why.</p>
Page 330	Page 332
<p>---</p> <p>1 loaded question. I'll answer the question the 2 way I wanna answer it. 3 BY MR. CARSON: 4 Q. You don't get to choose what questions you 5 answer. 6 A. I am. Either you wanna hear my answer, or 7 you don't get an answer. Do it your way. 8 MR. CARSON: All right. If your client's 9 not gonna answer questions, we're gonna stop 10 and file a motion, Jon, okay, because this is 11 ridiculous. 12 MR. CAVALIER: Seth, he's trying to answer 13 your question -- 14 MR. CARSON: No, he's not. He's trying -- 15 MR. CAVALIER: -- questions that involve 16 legal definitions. You're loading the 17 questions by assuming that some kind of a 18 report occurred. You're loading the questions 19 by -- 20 MR. CARSON: Jon, I'm referencing an email 21 that was sent from my client to him. The email 22 says that there's continued abusive and 23 deceitful behavior. My question is simple: 24 Are you concerned that it might implicate</p>	<p>---</p> <p>1 A. I'm going to tell you why. 2 Q. No, Mr. Pipes. There's no question 3 pending. 4 A. Well, that's the next thing I'm gonna do 5 is -- 6 --- 7 (Indistinguishable cross-talk.) 8 --- 9 BY MR. CARSON: 10 Q. Mr. Pipes, there's no question pending, 11 and we're gonna stop the deposition, and we're gonna 12 get -- I'm just gonna file a motion tomorrow and let 13 him know that the witness was completely 14 nonresponsive, refused to cooperate in a deposition, 15 and I'm gonna ask to do another seven hours. 16 MR. CAVALIER: Hey, Daniel, if he doesn't 17 wanna hear you say why, he doesn't need to hear 18 you say why. I mean, it's his loss, not yours. 19 BY MR. CARSON: 20 Q. So the next sentence in the email says, 21 "The outline of this job description is also 22 concerning due to Gregg's history of discrimination 23 and harassment of female employees in the workplace. 24 Can you even consider a female employee for this</p>

Page 333	Page 335
<p>1 position knowing she will have to work closely with 2 Gregg Roman and report directly to him?" 3 A. Tricia McNulty had proven herself to be a 4 liar. Why would I pay attention to all the things 5 she was saying? 6 Q. When did she prove herself to be a liar, 7 Mr. Pipes? 8 A. By saying different things about what 9 Gregg did, by changing her story. How can I believe 10 her? 11 Q. Well, let me ask you a question. When did 12 you find out that she changed her story? 13 A. On November 2nd. November 1st, she told 14 me one thing; November 2nd, she wrote me another 15 thing; and then, subsequently -- I don't remember 16 which date -- she came up with a third story. 17 Q. You sure you wanna go with that testimony 18 right now? 19 A. I'm very sure. 20 MR. CAVALIER: Object to form. 21 BY MR. CARSON: 22 Q. Okay, good. Didn't you testify today that 23 you just found out that she said the second thing on 24 November 2nd?</p>	<p>1 for the director of development. I didn't tell 2 her she should or should not. She decided she 3 wanted to apply, but she didn't like the terms 4 of it. Fine. It's -- 5 --- 6 (Indistinguishable cross-talk.) 7 --- 8 THE WITNESS: -- with Marnie and the 9 others, I have to take everybody's wish and 10 make that my command. 11 BY MR. CARSON: 12 Q. Okay, Mr. Pipes. Thank you. 13 A. Let me finish. 14 Q. No, no. You don't have to finish. 15 There's no question pending. 16 MR. CAVALIER: No. This time, you asked a 17 question. 18 MR. CARSON: No, I did not. We're not -- 19 Jon, he's not just gonna go on and wax poetic 20 during the next hour and a half. That's not -- 21 MR. CAVALIER: -- you asked him about 22 whether he considered her for the job and -- 23 BY MR. CARSON: 24 Q. Did you consider her for the job, yes or</p>
Page 334	Page 336
<p>1 MR. CAVALIER: Object to form. 2 THE WITNESS: No. 3 BY MR. CARSON: 4 Q. No, you didn't? Okay. "Due to parameters 5 that are supposed to be in place concerning myself 6 and Gregg, I am wondering how it would be possible 7 for me to even be considered for this position." 8 Did you consider her for the position knowing that 9 she'd have to work with Gregg, yes or no? 10 MR. CAVALIER: Object to form. 11 THE WITNESS: It's a loaded question. 12 BY MR. CARSON: 13 Q. Did you consider her for the position? 14 A. She would have been considered had she 15 applied, but this was simply the announcement of a 16 job, so how could I consider her before she applied? 17 Q. She never told you she was interested in 18 the position? 19 MR. CAVALIER: Object to form. 20 THE WITNESS: She announces here that 21 she's interested in the position but doesn't 22 wanna work for Gregg, so she'd have to tell me 23 who the director of development is going to 24 report to. I didn't tell her she had to apply</p>	<p>1 no? It's a yes or no question. 2 A. Not a yes or no question. 3 Q. "Giving you" -- so what did you mean here 4 on June 9th, 2019? You wrote -- and this is 5 Document No. 26 -- "Giving you an advance look, 6 though small changes might still be made to it." 7 What's that mean? 8 A. That means I gave her the courtesy, since 9 she was interested in the job, of seeing what the 10 description would be, but I wasn't taking orders 11 from Tricia on how to define the job. The job was 12 an administrative job. I am not the administrator, 13 and I thought that that job -- the person in that 14 job should report to Gregg, and that's what would 15 have been had we gone through with that job, which 16 we didn't because, shortly after this, she then did 17 the EEOC letter, and then we just -- I just stopped 18 it completely. 19 Q. Thank you, Mr. Pipes. The next email is 20 on June 11th, 2019, and the document number is 21 000027, and in this email, she says, "Daniel, there 22 have been no new instances of sexual harassment 23 since November when Gregg was removed from the 24 office, but I was referring to the ongoing</p>

Page 337	Page 339
<p>---</p> <p>1 psychological harassment we discussed following his</p> <p>2 phone call with Matt." So, here, she's reporting</p> <p>3 ongoing psychological harassment, correct?</p> <p>4 A. Correct.</p> <p>5 Q. So that's three emails she sent to you</p> <p>6 reporting Gregg's misconduct since November 5th,</p> <p>7 2019, right?</p> <p>8 A. No, wrong.</p> <p>9 Q. Not three emails?</p> <p>10 A. She's reporting what she heard from Matt.</p> <p>11 She didn't hear it from Gregg. She heard Matt's</p> <p>12 version of what Gregg said. What Gregg said he said</p> <p>13 and what Matt said he said were different, so I</p> <p>14 don't know what the truth was.</p> <p>15 Q. So you disregarded her email, correct?</p> <p>16 MR. CAVALIER: Object to form.</p> <p>17 THE WITNESS: -- regard it. I can't take</p> <p>18 every single statement of someone and rearrange</p> <p>19 the office at their convenience. We had an</p> <p>20 agreement -- one in November, and a second</p> <p>21 agreement in March -- and they were all gunning</p> <p>22 for each other's jobs. They were hating and</p> <p>23 loving and engaged with each other in all sorts</p> <p>24 of complex ways, and here she goes on about</p>	<p>---</p> <p>1 BY MR. CARSON:</p> <p>2 Q. She said that it happened following the</p> <p>3 phone calls with Matt.</p> <p>4 A. She had no direct contact with Gregg. She</p> <p>5 had contact with Matt, who she had a great affection</p> <p>6 for, and Matt had a relationship with Gregg which</p> <p>7 was complex, and the three of them went from Gregg</p> <p>8 to Matt -- maybe Gregg to Matt, and Matt,</p> <p>9 definitely, to Tricia. I --</p> <p>10 Q. The email continues, "Gregg continues to</p> <p>11 be the director, a position of power and authority,</p> <p>12 which will always be detrimental to my ability to be</p> <p>13 successful here. Even though I report to you, I am</p> <p>14 still receiving directives and deadlines to be met</p> <p>15 by Gregg. For all intents and purposes, I am still</p> <p>16 held accountable to him." Right? That's what she</p> <p>17 said to you?</p> <p>18 A. That's what she said, and that's what she</p> <p>19 agreed to back in March.</p> <p>20 Q. "You have stated that you highly dislike</p> <p>21 the administrative part of running a think tank,</p> <p>22 which you were forced into taking over when Gregg</p> <p>23 was removed from the office in November. That being</p> <p>24 said, my reporting to you as director of development</p>
Page 338	Page 340
<p>---</p> <p>1 what Matt said on a telephone call after Matt</p> <p>2 had left the office. Why is Matt reporting to</p> <p>3 her what Gregg allegedly said after he left the</p> <p>4 office?</p> <p>5 BY MR. CARSON:</p> <p>6 Q. Her email continues, "He has continued to</p> <p>7 spew slander regarding my work and my reputation.</p> <p>8 He has a history of speaking badly about employees</p> <p>9 to other employees and, as was the case in April, to</p> <p>10 former employees. It is very hard to work with</p> <p>11 someone knowing he is trying to damage my reputation</p> <p>12 and find a way to push me out of a job." So</p> <p>13 considering these -- the June 11th, 2019 email from</p> <p>14 Patricia McNulty to you, did you consider that a</p> <p>15 report of retaliation?</p> <p>16 A. Course not. I consider it a report of</p> <p>17 what Matt is telling her.</p> <p>18 Q. But she doesn't say this is what Matt --</p> <p>19 she's just saying to you --</p> <p>20 A. Yes, she does. "Following his phone calls</p> <p>21 with Matt." She got it from Matt.</p> <p>22 ---</p> <p>23 (Indistinguishable cross-talk.)</p> <p>24 ---</p>	<p>---</p> <p>1 would already put me at a disadvantage in my</p> <p>2 application pool since it would not alleviate your</p> <p>3 oversight of administrative tasks. Additionally, if</p> <p>4 Gregg is part of the hiring process for the director</p> <p>5 of development, I am even further disadvantaged,</p> <p>6 despite my experience and accomplishments, knowing</p> <p>7 full well he has already stated that he considers</p> <p>8 Marnie, Lisa, and me 'usurpers.'" That didn't come</p> <p>9 from Matt, did it?</p> <p>10 A. You tell me. I don't know where it came</p> <p>11 from.</p> <p>12 Q. Did you investigate it?</p> <p>13 A. You want me to full-time investigate every</p> <p>14 single email I get?</p> <p>15 Q. No. Every single report of --</p> <p>16 A. We went through all of this in November.</p> <p>17 I devoted a week to it. I moved on.</p> <p>18 Q. Right. You moved on, but they didn't,</p> <p>19 correct?</p> <p>20 A. Oh, no. They were building their case.</p> <p>21 We have perfect example of Tricia here building her</p> <p>22 case to take to Derek Smith Law Group and sue us for</p> <p>23 \$31 million. Good job, Tricia. Good job,</p> <p>24 Mr. Carson. Well done.</p>

Page 341	Page 343
<p>1 Q. This is what you intend to tell a jury?</p> <p>2 This is how you're gonna testify?</p> <p>3 A. They agreed. They agreed to what we set</p> <p>4 up in November, they agreed to the changes in March,</p> <p>5 and then, all of a sudden, in late May, early June</p> <p>6 or so, suddenly comes barrage of calumny against</p> <p>7 Gregg out of nowhere. Did he do anything? Did he</p> <p>8 do anything? All we know is that Matt said some</p> <p>9 things, quoted Gregg to Tricia. We know of no</p> <p>10 complaints that he actually did anything. We have</p> <p>11 generalizations about what a miserable person he is,</p> <p>12 how she doesn't like him. Okay. So what am I</p> <p>13 supposed to do, change the whole organization all</p> <p>14 over again because Tricia is saying these things?</p> <p>15 Q. No, of course not, right? You didn't even</p> <p>16 think about doing that, correct? Right? That's a</p> <p>17 question.</p> <p>18 ---</p> <p>19 (Indistinguishable cross-talk.)</p> <p>20 ---</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Right? Hello? There's a question</p> <p>23 pending, Mr. Pipes.</p> <p>24 A. I've answered you.</p>	<p>1 it. I'm trying to do my work, and these people are</p> <p>2 engaged in this backstabbing, including Matt, I'm</p> <p>3 sorry to say. Matt was part of it. Matt was part</p> <p>4 of this backstabbing, and I don't know why he did</p> <p>5 it. He left the organization. I don't know why he</p> <p>6 was doing it. I don't know [inaudible] Marnie</p> <p>7 wanted to be the head of it. I don't know why he</p> <p>8 was trying to get Tricia upset about Gregg. I don't</p> <p>9 know why. I don't know. Oh, and let me note that</p> <p>10 you asked about the rumor, the Brady rumor.</p> <p>11 Q. Yeah. There's no question pending about</p> <p>12 the Brady rumor.</p> <p>13 A. I now remember that the Brady -- I asked</p> <p>14 Lisa, is this new? Is this since November? She</p> <p>15 said no. Predated November. So --</p> <p>16 Q. Mr. Pipes, did you hire a deputy director?</p> <p>17 A. [Inaudible] --</p> <p>18 Q. No, I'm not. You're not gonna finish, Mr.</p> <p>19 Pipes. You're done, okay? Were you gonna hire a</p> <p>20 deputy director?</p> <p>21 ---</p> <p>22 (Indistinguishable cross-talk.)</p> <p>23 ---</p> <p>24 THE WITNESS: -- to me in April.</p>
Page 342	Page 344
<p>1 Q. No. My last question is, did you even</p> <p>2 consider doing that, making changes to the</p> <p>3 organization to protect the female employees who</p> <p>4 worked for you?</p> <p>5 MR. CAVALIER: Object to form.</p> <p>6 THE WITNESS: I made extensive changes to</p> <p>7 the organization in November --</p> <p>8 BY MR. CARSON:</p> <p>9 Q. In November.</p> <p>10 A. -- approval. I made further changes in</p> <p>11 March with their initiation and approval. I could</p> <p>12 not make, in every month, a whole new range of</p> <p>13 changes because someone doesn't like someone.</p> <p>14 Here's something from someone else that someone</p> <p>15 said. This was a viper's nest, and if I thought so</p> <p>16 then, I think so more and more as I've read the</p> <p>17 exchanges of emails between these people and the</p> <p>18 things about they were saying -- things they were</p> <p>19 saying about each other, things they were saying to</p> <p>20 each other, the things they were saying about</p> <p>21 others, incredible. So I hope you don't raise this,</p> <p>22 Mr. Carson, because it's just gonna raise a viper's</p> <p>23 nest of contention, ugliness, vulgarity, sexual</p> <p>24 accession. It's nasty stuff, and I was not part of</p>	<p>1 ---</p> <p>2 Actually, it took place before November, and it</p> <p>3 was a quiver in their satchel, which they</p> <p>4 brought out --</p> <p>5 MR. CARSON: Jon, you gotta get your</p> <p>6 client under control. I don't even know what</p> <p>7 he's talking about right now.</p> <p>8 MR. CAVALIER: So you do not want the</p> <p>9 witness to correct prior testimony?</p> <p>10 MR. CARSON: I have no idea. He's just</p> <p>11 been going on for the last five minutes. I</p> <p>12 don't think anyone here knows what he's talking</p> <p>13 about, so, please, get your client under</p> <p>14 control. He's not answering a question right</p> <p>15 now. He's just going on and on and on, and,</p> <p>16 seriously, I'm gonna file a motion about it</p> <p>17 because it's ridiculous. It's just ridiculous.</p> <p>18 It's not okay. You can't intentionally try to</p> <p>19 sabotage a deposition by answering yes or no</p> <p>20 questions by taking five minutes and going on</p> <p>21 and on and on just blabbering about nothing.</p> <p>22 He's not responsive to anything right now.</p> <p>23 MR. CAVALIER: It should go without saying</p> <p>24 that we disagree with the way you describe</p> <p>that. If you wanna file a motion --</p>



Page 345	Page 347
<p>---</p> <p>1 MR. CARSON: You don't have a choice, but</p> <p>2 that's what's happening, and I think the record</p> <p>3 will speak for itself, okay?</p> <p>4 MR. CAVALIER: To the extent the record</p> <p>5 can speak at all, to the extent you've</p> <p>6 interrupted the witness 500 times, and the</p> <p>7 court reporter has been put through hell during</p> <p>8 these six hours --</p> <p>9 MR. CARSON: We're gonna move on.</p> <p>10 MR. CAVALIER: -- we'll see what it looks</p> <p>11 like but --</p> <p>12 MR. CARSON: We're gonna move on now.</p> <p>13 BY MR. CARSON:</p> <p>14 Q. Mr. Pipes, you told -- you talked about</p> <p>15 hiring a deputy director. Did you ever do that, yes</p> <p>16 or no?</p> <p>17 A. No.</p> <p>18 Q. See this email from Lisa on July 18, 2019,</p> <p>19 Mr. Pipes?</p> <p>20 A. Yeah.</p> <p>21 Q. She talking about attending, I think, a</p> <p>22 conference in Washington D.C.; is that right?</p> <p>23 A. I don't know.</p> <p>24 Q. What?</p>	<p>---</p> <p>1 A. Apparently.</p> <p>2 Q. So here's another email from Ms. McNulty</p> <p>3 dated May 10th, right? May 10th, 2019, all right?</p> <p>4 This one, she says, "Daniel, I feel very</p> <p>5 uncomfortable in the situation I find myself now in.</p> <p>6 When Gregg was removed from the office the first</p> <p>7 time, I continued to work with him regularly. His</p> <p>8 role keeps him involved in events and fundraising,</p> <p>9 essentially working hand-in-hand with me." So she's</p> <p>10 telling you that, even after Gregg was ejected from</p> <p>11 the office, she still had to work with him, correct?</p> <p>12 A. No.</p> <p>13 Q. Not what she's saying there?</p> <p>14 A. No.</p> <p>15 Q. Says, "When Gregg was removed from the</p> <p>16 office the first time". Is she referring to the</p> <p>17 November 5th, 2018 situation when he was removed</p> <p>18 from the office there?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. She said, "I continue to work with</p> <p>21 him regularly," right?</p> <p>22 A. Yes.</p> <p>23 Q. So then why'd you say no a minute ago?</p> <p>24 MR. CAVALIER: Objection.</p>
Page 346	Page 348
<p>---</p> <p>1 A. I don't know.</p> <p>2 Q. Marc writes, "Dear Lisa, as you well know,</p> <p>3 [unintelligible] no surprises when it comes to</p> <p>4 activities that could embarrass the organizations,</p> <p>5 especially political activities. As you know,</p> <p>6 Daniel Pipes previously confronted you about your</p> <p>7 surprise travels, first on April 17th about your</p> <p>8 meeting in D.C. with Jack Posepiak [phonetic], then</p> <p>9 on May 28th about your travels to the UK." Do you</p> <p>10 remember?</p> <p>11 A. I read it, yeah.</p> <p>12 Q. So she responds and says, Please see the</p> <p>13 attached screenshot. I asked Dr. Pipes for</p> <p>14 permission, and he granted it. So she did talk to</p> <p>15 you about going to that conference in D.C., right,</p> <p>16 and you said okay?</p> <p>17 MR. CAVALIER: Object to form.</p> <p>18 THE WITNESS: This is a letter from Marc</p> <p>19 to Lisa, and from Lisa to Marc. I'm not quite</p> <p>20 sure what we're supposed to...</p> <p>21 BY MR. CARSON:</p> <p>22 Q. I'm asking you if you -- she says that you</p> <p>23 gave her permission to go. She asks, and you</p> <p>24 granted permission; is that true?</p>	<p>---</p> <p>1 THE WITNESS: Because there's</p> <p>2 communication that the next sentence is about</p> <p>3 the pre-March era.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. All right. So we'll read that, then.</p> <p>6 "Everyone else here [sic] received a reprieve from</p> <p>7 him, but I did not." She's referring to between</p> <p>8 November 5th, 2018 and March 2018. She's saying,</p> <p>9 even during that time period, I didn't get a</p> <p>10 reprieve, right?</p> <p>11 MR. CAVALIER: Object to form.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. Is that how you understand it?</p> <p>14 A. Understand what?</p> <p>15 Q. What she wrote to you. I'll continue.</p> <p>16 "Everyone else received a reprieve from him, but I</p> <p>17 did not. With him returning to that role, I will</p> <p>18 again continue to be working with him just as much</p> <p>19 as ever. I had very much wanted to believe that he</p> <p>20 had learned a lesson and could be brought back</p> <p>21 because I knew it would make your life better, but I</p> <p>22 was wrong," right? "Now I find myself again on the</p> <p>23 very bad side of Gregg, who remains in power.</p> <p>24 Despite splitting that power into two parts, it is</p>

Page 349	Page 351
<p>1 still -- it is still a position of power that could  2 directly affect my career and future. There will  3 never be a day when Gregg doesn't think it would be  4 in his best interest to not have me at MEF. Between  5 the sexual harassment, the verbal abuse, and the  6 slander of my character and reputation that has all  7 been made known, he will force me out of the Forum  8 the second he has an opportunity. I witnessed him  9 drive Eman, Grayson, and Gary out of employment at  10 the Forum because he didn't want to be working with  11 them. He will back me into a corner until I have no  12 choice to leave, like each of them" [as read]. She  13 is complaining to you after November 5th, 2018,  14 correct?</p> <p>15 A. She got in touch with a shoddy lawyer who  16 told her to start documenting how terrible  17 everything was, and she did that, and a few days  18 later, she filed an EEOC complaint. Yes.</p> <p>19 Q. What lawyer did she get in touch with by  20 May 10th, 2019?</p> <p>21 A. Perhaps yourself, perhaps another one.</p> <p>22 Q. I'll represent to you she didn't get a  23 lawyer by May 10th, 2019.</p> <p>24 A. She was on her way to getting a lawyer.</p>	<p>1 would cause him to be fired, that he did something  2 that was terrible. There are vague things about  3 Gregg --</p> <p>4 Q. My question was, she did complain again,  5 correct?</p> <p>6 A. I'm answering it --</p> <p>7 Q. No, you're not. My question was, did she  8 complain again? That's the question, Mr. Pipes.  9 It's yes or no or "I don't know". You're allowed to  10 say "I don't know," too. Did she complain again?  11 Is this another complaint?</p> <p>12 A. I am not gonna answer your loaded  13 question.</p> <p>14 Q. You have to answer the question.</p> <p>15 ---  16 (Indistinguishable cross-talk.)  17 ---</p> <p>18 BY MR. CARSON:</p> <p>19 Q. -- say whatever you want to my questions.  20 It's a yes or no question. Did she complain again?  21 Is this a complaint?</p> <p>22 MR. CAVALIER: He's trying to give you the  23 context --</p> <p>24 MR. CARSON: No. I'm not asking for</p>
Page 350	Page 352
<p>1 She was the one who went first to a lawyer, and you  2 are the lawyer, I believe, and she was setting up  3 her argument. Note that these all came late in the  4 day just before the EEOC complaint. Gregg never  5 tried to get rid of her. This is --</p> <p>6 Q. So this is part of the conspiracy, right,  7 the huge conspiracy that you've concocted?</p> <p>8 A. The conspiracy you've concocted, yes.</p> <p>9 Q. "I honestly do not know what I am supposed  10 to do in this position. Like I said to you before,  11 I feel like I am in a lose-lose situation. I do  12 believe that speaking to a lawyer is in my best  13 interest." She hadn't gone to a lawyer, right?  14 She's thinking about it right now.</p> <p>15 A. [Inaudible].</p> <p>16 Q. What?</p> <p>17 A. Preparing the way to go to a lawyer.</p> <p>18 Q. Preparing the way to go to a lawyer, okay.  19 But the point is she did complain about Gregg again,  20 correct?</p> <p>21 A. Well, it's the same point she's making in  22 slightly different words over and over again, but  23 not -- at no point after November was there any  24 specific allegation that Gregg did something that</p>	<p>1 context. I'm asking a yes or no question.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. Did she complain again?</p> <p>4 A. No.</p> <p>5 Q. She didn't -- this is not a complaint,  6 right?</p> <p>7 A. No.</p> <p>8 Q. Okay. So we've now looked at a complaint  9 on April 23rd, 2019, one on June 10th, 2019, one on  10 June 11th, 2019, and one on May 10th, 2019. They're  11 all from Patricia McNulty. Do you remember that  12 today?</p> <p>13 A. No. I --</p> <p>14 Q. You don't remember?</p> <p>15 A. I said no, I do not remember. I do not  16 see complaints. I see moaning about Gregg. I do  17 not see any complaints, anything for me to act on.</p> <p>18 Q. That's what Patricia McNulty's doing,  19 she's moaning about Gregg?</p> <p>20 A. That's what she's doing.</p> <p>21 Q. Okay. Thank you.</p> <p>22 A. Not providing me with any specifics that I  23 can act on.</p> <p>24 Q. I understood your answer. Mr. Pipes --</p>

Page 353	Page 355
<p>1 --- 2 --- (Indistinguishable cross-talk.) 3 --- 4 MR. CARSON: There's no question on the 5 table. 6 MR. CAVALIER: He's finishing his answer. 7 MR. CARSON: No, there's no question. All 8 right. So right now we are going to look at -- 9 and, by the way, that was -- the last complaint 10 we looked at was on -- was D000037. 11 MR. CAVALIER: I'm objecting to the -- 12 --- 13 (Indistinguishable cross-talk.) 14 --- 15 THE COURT REPORTER: Nothing is getting 16 written down when you're talking at the same 17 time. 18 MR. CARSON: That's okay. I'm just 19 letting the court reporter -- I'm sorry -- the 20 videographer know what exhibits we're at. 21 BY MR. CARSON: 22 Q. So the next thing we're gonna look at 23 is -- so this is a email where -- do you remember 24 this email where Marnie Meyer complains?</p>	<p>1 --- 2 old -- it's the old issues. 3 Q. But you didn't investigate this rumor in 4 2018 because you didn't know about it, right? 5 A. -- know about it, but when I asked Lisa -- 6 Q. I'm sorry. Did you say you did not know 7 about it? 8 A. I did not know about it until spring -- 9 I'm not sure when -- of 2019, and when I heard about 10 it, the most important thing to me was when did this 11 take -- when did she hear about this? 12 Q. Yeah. 13 A. When she heard about -- let me finish. 14 She said she heard about it before November '18, and 15 that made me less anxious about it because whoever 16 had initiated it, it took place in the previous era, 17 and we are now out of that. So I don't know -- 18 Q. Yeah. That's because you gave Gregg 19 immunity for everything that happened before 20 November 2018, right? 21 A. I what? 22 Q. You gave him immunity. You gave him a 23 reprieve. If it happened before that, you weren't 24 interested. MR. CAVALIER: Object to form. Object as</p>
Page 354	Page 356
<p>1 --- 2 A. No. 3 MR. CAVALIER: Object to form. 4 BY MR. CARSON: 5 Q. She's saying Gregg -- you see right here, 6 "Gregg has made it clear he has hostilities toward 7 me and he now -- and is now known to have started 8 rumors about me, damaging my reputation, for which 9 he has not even been held accountable in any manner, 10 including a simple apology" [as read]. Right? 11 She's complaining there, correct? 12 A. No. 13 Q. Okay. So now that's -- you said there 14 wasn't one complaint against Gregg Roman after 15 November 5th, 2019, and I would represent to you 16 that we've now looked at at least seven, but you're 17 saying none of them are complaints, correct? 18 A. This was a complaint about something that 19 happened before November 2018. 20 Q. That you found out about after -- 21 A. I asked Lisa when she told me about this 22 Brady rumor, was this pre or post November '18, and 23 she said pre. So this is from before. It is not a 24 new complaint. It is raising the same old complaints in a new way, or at a new time, as the</p>	<p>1 --- 2 argumentative. 3 THE WITNESS: No, I did not give immunity. 4 I severely curtailed his hour, his 5 remuneration, and other aspects of his job. 6 BY MR. CARSON: 7 Q. You've already testified about that. 8 --- 9 (Indistinguishable cross-talk.) 10 --- 11 THE WITNESS: -- can't just interrupt me. 12 BY MR. CARSON: 13 Q. It was another yes or no question. That's 14 it, yes or no. Mr. Pipes, what about this? Here, 15 there's another -- there's another sentence here. 16 Besides the rumor about Marnie Meyer, she says, 17 "Gregg has made it clear that he has hostilities 18 toward me". That's present tense, correct? 19 A. I will answer my way, or I don't answer. 20 Q. I mean, I'm asking you if she's talking in 21 the present tense. 22 A. I will answer as I wish to answer, and 23 you'll let me answer. 24 Q. It's a simple yes or no question -- is she talking in present tense -- or maybe you don't know.</p>

Page 357	Page 359
<p>1 Yes, no, I don't know?</p> <p>2 A. You gonna let me answer?</p> <p>3 Q. I'm asking you a question, if you can</p> <p>4 answer my question. Is she talking in the present</p> <p>5 tense right here?</p> <p>6 A. Are you gonna censor me or gonna let me</p> <p>7 speak?</p> <p>8 Q. I'm not censoring you. I'm asking you a</p> <p>9 question. You can answer my question. Is she</p> <p>10 talking in the present tense? This is a present</p> <p>11 complaint, correct, or did you not see it that way?</p> <p>12 It's just a yes or no question.</p> <p>13 A. I would like to answer my way.</p> <p>14 Q. Is your way include saying yes or no?</p> <p>15 MR. CAVALIER: Seth, just let him answer the</p> <p>16 question.</p> <p>17 MR. CARSON: No, I'm not, because he</p> <p>18 answers every single question by not answering</p> <p>19 the question and just talking and talking and</p> <p>20 talking.</p> <p>21 MR. CAVALIER: We deposed your client a</p> <p>22 week ago, and she went on for pages.</p> <p>23 ---</p> <p>24 (Indistinguishable cross-talk.)</p>	<p>1 MR. CARSON: We're gonna go off the record</p> <p>2 because, I mean, he's just not answering right</p> <p>3 now. So I'm gonna stop sharing --</p> <p>4 MR. CAVALIER: Ask the question, Seth.</p> <p>5 MR. CARSON: Is it a present tense</p> <p>6 sentence?</p> <p>7 MR. CAVALIER: Answer the question in the</p> <p>8 way you think it needs to be answered.</p> <p>9 MR. CARSON: I mean, at this point it</p> <p>10 doesn't matter what happens. We're just gonna</p> <p>11 have to deal with it with the court because you</p> <p>12 guys are what's wasting a lot of time today</p> <p>13 with nothing, and it's really -- you know, it's</p> <p>14 obviously a strategy. It's not a good</p> <p>15 strategy, but, you know, I'm objecting to the</p> <p>16 nonresponsiveness throughout the entire day.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. Mr. Pipes, are you gonna continue the</p> <p>19 deposition, yes or no?</p> <p>20 A. Yes, if you let me speak.</p> <p>21 Q. Well, you can speak all you want, but your</p> <p>22 responses and what you say have to be in answer to</p> <p>23 my question. You can't just say whatever you want</p> <p>24 to anything I say.</p>
Page 358	Page 360
<p>1 ---</p> <p>2 MR. CARSON: Are you guys gonna give me</p> <p>3 eight and a half hours today? I'll let him</p> <p>4 answer whatever he needs to, however long he</p> <p>5 needs to.</p> <p>6 MR. CAVALIER: You didn't give us eight --</p> <p>7 MR. CARSON: Yeah, I did. I gave you</p> <p>8 eight and a half hours.</p> <p>9 MR. CAVALIER: Secondly, if you wanna ask</p> <p>10 questions that require context, he's allowed to</p> <p>11 give it.</p> <p>12 ---</p> <p>13 (Indistinguishable cross-talk.)</p> <p>14 ---</p> <p>15 MR. CAVALIER: -- far further along if you</p> <p>16 would stop interrupting him and just let him --</p> <p>17 MR. CARSON: No, we wouldn't. My</p> <p>18 question, Jon, is if this is a present tense</p> <p>19 sentence. That's the question. Is it in the</p> <p>20 present tense? That's all I'm asking.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Do you know, Mr. Pipes, whether this is in</p> <p>23 present tense?</p> <p>24 A. You gonna censor me or let me speak?</p>	<p>1 MR. CAVALIER: He's not. He's trying to</p> <p>2 answer your question.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. Okay. So my question here with regard to</p> <p>5 this email -- I'm not -- this is the last time I'm</p> <p>6 gonna try this. My question here with regard to</p> <p>7 this email is, do you see here right here where it</p> <p>8 says, "Gregg Roman has made it clear that he has</p> <p>9 hostilities toward me"?</p> <p>10 A. You gonna box me in to one-syllable answer</p> <p>11 or --</p> <p>12 Q. Do you see that?</p> <p>13 A. No, I don't see it.</p> <p>14 Q. You don't see it? I just highlighted it.</p> <p>15 MR. CAVALIER: The document's not up.</p> <p>16 BY MR. CARSON:</p> <p>17 Q. Do you see it now? "Gregg Roman has made</p> <p>18 it clear that he has hostilities toward me."</p> <p>19 A. I see it.</p> <p>20 Q. Okay. Isn't she talking in the present</p> <p>21 tense there?</p> <p>22 A. You gonna let me answer?</p> <p>23 Q. It's just a yes or no.</p> <p>24 MR. CAVALIER: I'm gonna object to the</p>



Page 361	Page 363
<p>---  1 form. The document speaks for itself, and it's  2 literally not in the present tense, and you  3 keep asking --  4 MR. CARSON: "Gregg has made it clear" --  5 then he can say no, can't he?  6 THE WITNESS: No, it's not in the present  7 tense.  8 BY MR. CARSON:  9 Q. Okay. So you think when she was saying  10 this she was talking about the Caitriona Brady  11 situation?  12 A. "Has made" is past tense. "Has" is  13 present tense.  14 Q. Okay. Thank you for answering.  15 A. Therefore, it is not a single-word answer.  16 Q. All right. Your answer was no. Do you  17 think that when she said -- do you think when she  18 said this she was referring to the Caitriona Brady  19 rumor, or you think she was talking about continued  20 hostilities?  21 A. It goes on to mention the rumor, but, of  22 course, we now know that the rumor actually dated  23 from a half year earlier.  24 Q. But doesn't she say, "Gregg Roman made it</p>	<p>---  1 A. You tell me.  2 Q. Well, I'm asking. You're the one who said  3 it. Marnie -- this is your email, right, Daniel  4 Pipes to Marnie Meyer?  5 A. That's my email from a year and a half  6 ago. I don't recall. You have the list of -- you  7 have the documents. I don't.  8 Q. I can't -- we can't hear you, Mr. Pipes.  9 Can you speak up? Here, you say, "I understand your  10 feelings and sympathize with them and respect your  11 reluctance. Gregg has made many -- made errors and  12 many of -- Gregg has made errors, and many of us,  13 including myself, have issues with what he has done.  14 Accordingly, he has a diminished standing at MEF,  15 including severely limited access to the office.  16 You are not asked to be alone with him, you do not  17 report to him, and he has no say over your  18 employment duties or status" [as read]. Sent that  19 on June 5th, 2019, right? Can you hear me?  20 A. Yep.  21 Q. You sent that on June 5th, 2019, correct?  22 A. Correct.  23 Q. Okay. You also write, "Gregg Roman has  24 had -- has had many errors" [as read], correct?</p>
Page 362	Page 364
<p>---  1 clear that he has hostilities and is now known to  2 have started rumors against me" [as read]? Isn't  3 that two things?  4 A. Well, they're obviously connected because  5 she mentions one right after the other, and so she's  6 referring to something --  7 Q. Mr. Pipes, you answered the question.  8 A. -- six months earlier, pre November '18.  9 Q. Okay. So the next thing we're gonna look  10 at is -- who said this right here? The bane of  11 my -- "This tension is the bane of my life," right?  12 You forwarded Marnie's email complaining about Gregg  13 to Gregg, and then said, "This tension is the bane  14 of my life," right?  15 A. Right.  16 Q. Your key statement below is, "I'm no  17 longer comfortable with Gregg reviewing or having  18 access to my work product or your resulting refusal  19 to work with him" [as read]. That was in connection  20 to the finances, right?  21 MR. CAVALIER: Object to form.  22 BY MR. CARSON:  23 Q. Was that -- what was that in connection  24 to, Mr. Pipes?</p>	<p>---  1 A. Correct.  2 Q. What are the errors you're referring to  3 there?  4 A. Pre November '18.  5 Q. But you also say, you have to work with  6 Gregg Roman, correct?  7 A. Correct.  8 Q. So you're forcing her to work with him  9 after November 5th, 2019 -- 2018, correct?  10 MR. CAVALIER: Object to form.  11 BY MR. CARSON:  12 Q. You're forcing her to work with him,  13 correct?  14 MR. CAVALIER: Same objection.  15 BY MR. CARSON:  16 Q. I mean, "You have to work with Gregg  17 Roman." That's what you said?  18 A. I'm not forcing her. She is free to --  19 Q. Can't hear you.  20 A. No, I'm not forcing her.  21 Q. I mean, if she wants to continue her  22 employment, she has to, right?  23 A. Correct.  24 Q. What?</p>

Page 365	Page 367
<p>1 A. Yes.</p> <p>2 Q. Okay.</p> <p>3 THE VIDEOGRAPHER: Counsels, we are in the</p> <p>4 last 60 minutes until seven hours, for your</p> <p>5 information.</p> <p>6 MR. CARSON: So the next thing we're gonna</p> <p>7 look at is November -- is Documents 50, 51, 52.</p> <p>8 THE VIDEOGRAPHER: Thank you.</p> <p>9 MR. CARSON: Got it?</p> <p>10 ---</p> <p>11 (Indistinguishable cross-talk.)</p> <p>12 ---</p> <p>13 MR. CARSON: What?</p> <p>14 THE VIDEOGRAPHER: Yes, Counselor.</p> <p>15 BY MR. CARSON:</p> <p>16 Q. November 6, 2018. You see this? Is this</p> <p>17 the agreement between you and Gregg Roman for him to</p> <p>18 continue working with the Middle East Forum after</p> <p>19 November 5th, 2018 meeting?</p> <p>20 A. Looks like it, yeah.</p> <p>21 Q. So he keeps his -- keeps his title as</p> <p>22 director, correct?</p> <p>23 A. Looks like it.</p> <p>24 Q. Yeah?</p>	<p>1 ---</p> <p>2 BY MR. CARSON:</p> <p>3 Q. [Unintelligible]. You already testified</p> <p>4 to that, right?</p> <p>5 MR. CAVALIER: Object to argumentative</p> <p>6 nature of the question. To the extent you can</p> <p>7 answer, you can answer.</p> <p>8 BY MR. CARSON:</p> <p>9 Q. Why are you trying to compare the -- why</p> <p>10 are you trying to relate Gregg Roman going rogue and</p> <p>11 signing up with a \$200,000 health insurance policy</p> <p>12 for the office, and what you did in response to</p> <p>13 that, to this document?</p> <p>14 MR. CAVALIER: Object to form.</p> <p>15 THE WITNESS: The complaints in November</p> <p>16 fell into two categories, the sexual complaints</p> <p>17 and the management complaints. The sexual</p> <p>18 harassment complaints I dealt with by excluding</p> <p>19 him from the office and limiting his contact</p> <p>20 with the female employees. The administrative</p> <p>21 and management complaints I dealt with by</p> <p>22 taking him out of administration. They're two</p> <p>23 separate problems which I dealt with in two</p> <p>24 separate ways, and the -- I initially kept the</p> <p>remuneration the same, and benefits, and then</p>
Page 366	Page 368
<p>1 ---</p> <p>2 A. Yep.</p> <p>3 Q. He continues to make the same amount of</p> <p>4 money, no -- all his benefits are the same, correct?</p> <p>5 A. No. No, I said.</p> <p>6 Q. "Your salary and benefits remain</p> <p>7 unchanged." Isn't that part of the agreement?</p> <p>8 A. No.</p> <p>9 Q. Well, it says so right here, though,</p> <p>10 right?</p> <p>11 A. Yeah, but that isn't what happened.</p> <p>12 Q. Well, what happened that's different than</p> <p>13 that?</p> <p>14 A. I learned that he had, I think, \$27,000 in</p> <p>15 health insurance, and I took that away.</p> <p>16 Q. But that has nothing to do with this,</p> <p>17 though, right?</p> <p>18 A. When I found out about that, I took it</p> <p>19 away. That was --</p> <p>20 Q. It has nothing to do with the conditions</p> <p>21 that you imposed upon Gregg because of all the women</p> <p>22 coming forward and reporting sexual harassment,</p> <p>23 discrimination, and harassment, correct?</p> <p>24 MR. CAVALIER: Object to form. Object to</p> <p>lack of foundation.</p>	<p>1 ---</p> <p>2 when I learned shortly afterwards that he had</p> <p>3 \$27,000 or so in health insurance, we were</p> <p>4 paying -- the Forum was paying \$27,000 a year</p> <p>5 in health insurance. I took that away, so, in</p> <p>6 fact, he did have a significant loss of income.</p> <p>7 BY MR. CARSON:</p> <p>8 Q. But he didn't have a significant loss</p> <p>9 because of the women's complaints, right? The loss</p> <p>10 of the health insurance was connected to his own</p> <p>11 misconduct, correct?</p> <p>12 A. No, it was not misconduct. It was bad</p> <p>13 management.</p> <p>14 Q. His own bad management, right?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. So the next thing we're gonna look</p> <p>17 at is an email from Lisa Barbounis to you. "Gregg</p> <p>18 Roman will be restated -- will be reinstated as</p> <p>19 director of MEF" -- and this is Document 54. "He</p> <p>20 will maintain responsibility for projects,</p> <p>21 developments, and communications, anything</p> <p>22 content/production related. He will have no</p> <p>23 oversight over finance operations. His position as</p> <p>24 director will remain probationary" [as read] -- so,</p> <p>here, Lisa is saying that his position is</p>

Page 369	Page 371
<p>1 ---</p> <p>2 probationary, too, right?</p> <p>3 A. Yes. That was public. His -- he was on</p> <p>4 probation.</p> <p>5 Q. And while he's on this probationary</p> <p>6 status, there have been -- there were multiple</p> <p>7 emails to you complaining about his conduct and --</p> <p>8 is that correct?</p> <p>9 MR. CAVALIER: Object to form.</p> <p>10 THE WITNESS: No.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. While he was on probationary status, he</p> <p>13 received multiple emails complaining about Gregg</p> <p>14 Roman's misconduct, correct, or not correct?</p> <p>15 MR. CAVALIER: Object to form.</p> <p>16 THE WITNESS: Not correct.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. Sorry?</p> <p>19 A. Not correct.</p> <p>20 Q. It was just moaning, those emails, right?</p> <p>21 MR. CAVALIER: Object to form.</p> <p>22 THE WITNESS: -- same old thing and</p> <p>23 preparing --</p> <p>24 BY MR. CARSON:</p> <p>Q. Wait, wait. Did you say "same old</p>	<p>1 ---</p> <p>2 really germane. In the case of the Gregg, Matt,</p> <p>3 Tricia, I threw up my hands, and I couldn't get to</p> <p>4 the bottom of it and figured, you know, we're just</p> <p>5 gonna live with this.</p> <p>6 Q. Marnie was against Gregg Roman returning</p> <p>7 from the beginning, correct?</p> <p>8 A. Correct.</p> <p>9 Q. All right. So we're gonna look at a</p> <p>10 document that's marked 60 -- 00060, and that</p> <p>11 document says -- so here you're talking to Lisa</p> <p>12 Barbounis, and this is on June 5th, 2019, and you're</p> <p>13 talking to her about the article in The Guardian,</p> <p>14 and you were concerned about the possible</p> <p>15 consequences that -- because of, you know, while she</p> <p>16 was on her own time, it might be misconstrued as</p> <p>17 political activity from the Middle East Forum. So</p> <p>18 you say that although the trip was for fun -- strike</p> <p>19 that. You say -- excuse me. You say, "The article</p> <p>20 could entirely disappear, but it could pop up in the</p> <p>21 future," right?</p> <p>22 A. Yep.</p> <p>23 Q. Which one happened?</p> <p>24 MR. CAVALIER: Object to form.</p> <p>BY MR. CARSON:</p>
Page 370	Page 372
<p>1 ---</p> <p>2 moaning"? Is that how you started the response?</p> <p>3 A. You gave several examples of Tricia</p> <p>4 repeating herself, giving no specifics other than</p> <p>5 what Matt allegedly said to her. And, otherwise,</p> <p>6 it's gearing up for lawsuits.</p> <p>7 Q. They were just moaning and conspiring,</p> <p>8 right?</p> <p>9 A. Well, there are no specifics. In</p> <p>10 November, I had specific after specific about money,</p> <p>11 about misuse of authority and the like. Here, it</p> <p>12 was moaning. It was saying, Gregg doesn't like me.</p> <p>13 Gregg doesn't want me here. Gregg this, Gregg that,</p> <p>14 but there's nothing specific, nothing for me to --</p> <p>15 Q. Did you schedule any meetings to ask them</p> <p>16 for specifics?</p> <p>17 A. My door was open. My emails were open.</p> <p>18 My texts were open. If you've got any problems with</p> <p>19 Gregg, tell me. And they did. You have been going</p> <p>20 through them. They did, but I look at them and say,</p> <p>21 I don't see specifics here. And when I did see one</p> <p>22 specific about the Gregg, Matt, Tricia thing, and</p> <p>23 when I saw another one with the rumor thing, I</p> <p>24 looked into them, and, in the rumor, I concluded it</p> <p>took place a half year earlier and, therefore, not</p>	<p>1 ---</p> <p>2 Q. Did it entirely disappear, or did it pop</p> <p>3 up in the future?</p> <p>4 A. No, it didn't, either. Where do you see</p> <p>5 that, the "pop up in the future"? I'm not seeing</p> <p>6 that.</p> <p>7 Q. Is it down on this one?</p> <p>8 [Unintelligible] -- "This rates as both a surprise</p> <p>9 and an unwelcome complication. The article could</p> <p>10 entirely disappear, but it could also pop up in the</p> <p>11 future and make trouble for us." Did it ever pop up</p> <p>12 and make trouble for you?</p> <p>13 A. No.</p> <p>14 Q. It entirely disappeared, right?</p> <p>15 A. No.</p> <p>16 MR. CAVALIER: Object to form.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. Sorry?</p> <p>19 A. No.</p> <p>20 Q. Well, what happened?</p> <p>21 A. It's there on the record and available to</p> <p>22 those who wish to make trouble for us.</p> <p>23 Q. But it's been a year and a half, and none</p> <p>24 of that trouble's happened, right?</p> <p>A. No. There was trouble. We had trouble in</p>

Page 373	Page 375
<p>1 Britain.</p> <p>2 Q. What was the trouble related to the</p> <p>3 article?</p> <p>4 A. Yeah. A number of articles about Lisa,</p> <p>5 about the Middle East Forum, Tommy Robinson. Yeah,</p> <p>6 there were some. It didn't have legal</p> <p>7 repercussions, which I most feared.</p> <p>8 Q. Did it have any repercussions?</p> <p>9 A. Yeah, it did. I just told you.</p> <p>10 Q. What were the repercussions?</p> <p>11 A. It was mentioned time and again that the</p> <p>12 Forum was connected to the Tommy Robinson campaign.</p> <p>13 Q. Okay. I'd like you to please -- I'll make</p> <p>14 a request on the record to produce any articles that</p> <p>15 you say were repercussions of the article referenced</p> <p>16 in Document 60, okay?</p> <p>17 A. Okay.</p> <p>18 MR. CAVALIER: I'll just note for the</p> <p>19 record that, to the extent you have a request</p> <p>20 out there that those documents would be</p> <p>21 responsive to, we will do so.</p> <p>22 MR. CARSON: Well, I think we do, and</p> <p>23 they're in their second request for production</p> <p>24 of documents in response to your counterclaim.</p>	<p>1 a colleague with whom you work, in your words,</p> <p>2 hand-in-hand." So you're acknowledging that she and</p> <p>3 Gregg have to work hand-in-hand, correct?</p> <p>4 A. Yes.</p> <p>5 Q. "He is not authorized to give you</p> <p>6 instructions, and he does not judge your work. In</p> <p>7 March, with your agreement, he took a more</p> <p>8 administrative -- he took -- he took on more</p> <p>9 administrative tasks, but this situation remains</p> <p>10 unchanged. Further, I plan the deputy director</p> <p>11 position that I sketched out for Marnie and you on</p> <p>12 Tuesday, that person will also report to me. In</p> <p>13 short, now and in the future, Gregg has no authority</p> <p>14 over you and cannot force you out of the Forum. I</p> <p>15 ask you to be wary of what Matt reported to you</p> <p>16 about Gregg's statements about you. I have reason</p> <p>17 to think that Matt wants to make trouble for us" [as</p> <p>18 read]. And that's -- you're basing that on Gregg</p> <p>19 telling you that Matt made that stuff up; is that</p> <p>20 right?</p> <p>21 A. In part, and in part on Matt's record of</p> <p>22 saying all sorts of things. I gave you one example</p> <p>23 of reporting to me that Marnie wants to become</p> <p>24 director, and he had a history with me of saying</p>
Page 374	Page 376
<p>1 BY MR. CARSON:</p> <p>2 Q. Sixty-two. So here in -- on June 17th,</p> <p>3 2017, you're talking about Lisa Barbounis' work on</p> <p>4 her own time, and you give her permission again.</p> <p>5 You say, "Go if you wish, but know that I will be</p> <p>6 very upset with -- upset with major consequences if</p> <p>7 your presence becomes known outside of Tommy</p> <p>8 Robinson's own circles" [as read], right?</p> <p>9 A. Yeah.</p> <p>10 Q. So you said you can keep doing it, just</p> <p>11 make sure there's no consequences for us, the Middle</p> <p>12 East Forum, right?</p> <p>13 A. Yeah.</p> <p>14 MR. CAVALIER: Object to form.</p> <p>15 THE WITNESS: One week before the EEOC</p> <p>16 complaints, I might note.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. I know that's on your mind, Mr. Pipes, but</p> <p>19 that wasn't a question. All right. So we're gonna</p> <p>20 look at Document 65 now. Document 65 is an email</p> <p>21 from you to Ms. McNulty on May 10th. You tell her,</p> <p>22 "Thank you for your thoughts. Most importantly, I'd</p> <p>23 like to point out that, since November, you and</p> <p>24 everyone else in the office reports to me. Gregg is</p>	<p>1 things that made me leery of what he was saying.</p> <p>2 Q. So I think -- I think that's everything on</p> <p>3 this one. There might -- let's see. Ms. Barbounis'</p> <p>4 employment from the Middle East Forum, she was</p> <p>5 permitted to submit expense reports, right?</p> <p>6 A. I don't know.</p> <p>7 Q. Why don't you know that?</p> <p>8 A. I didn't deal with expense reports.</p> <p>9 Q. Well, is it your understanding that</p> <p>10 employees were permitted to get reimbursed if they</p> <p>11 spent their own money on work-related expenses?</p> <p>12 A. If they were pre-authorized, yes. If they</p> <p>13 just decided -- [inaudible] --</p> <p>14 THE COURT REPORTER: I can't hear that,</p> <p>15 Mr. Pipes.</p> <p>16 THE WITNESS: If they pre-authorized, yes;</p> <p>17 if they on their own decided to submit</p> <p>18 expenses, no.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Well, if they submit expenses before they</p> <p>21 get paid, they have to be authorized, correct?</p> <p>22 A. They would only be reimbursed if they had</p> <p>23 been authorized. They got authorization.</p> <p>24 Q. And who makes that determination?</p>



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A. Gregg or me.

Q. Well, in 2018 and 2019, Marnie Meyer made that determination, correct?

A. No. We are speaking pre November. Post November, no, Marnie did not make that. I did.

Q. It's your testimony that in order for an expense to be authorized, you had to authorize it?

A. The personnel manual says the director or the president, and I took Gregg out of that, so it just left the president. Did not say the accountant.

Q. So were you authorizing all the expenses submitted to the Middle East Forum for reimbursement?

A. If there were, yes.

Q. Okay. So how would that work? Marnie would tell you, hey, someone submitted an expense, can I pay it out, and then you'd say yes?

A. Different ways.

Q. Generally, though, would the -- is the procedure that an employee would submit their receipts to Marnie Meyer, Marnie Meyer would then confirm with you whether she was permitted to reimburse the money, and then, if you said yes, she

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would reimburse it?

A. I don't remember the usual way.

Q. Well, what's the procedure for that?

A. The key point is that I would give the authorization or not. I don't remember the --

Q. But if Marnie Meyer reimbursed money, it means that you authorized it, correct?

MR. CAVALIER: Object to form.

THE WITNESS: She could've reimbursed money without checking with me.

BY MR. CARSON:

Q. Do you know whether she did that?

A. I do not.

Q. Have you ever thought that she might've done that?

A. I don't deal with the books.

Q. Well, do you have any reason to believe she did that?

A. I don't know if she did or not.

Q. So you don't have any reason to believe -- it's not your question. Do you have any reason to believe that Marnie was authorizing expenses when she wasn't supposed to?

A. I don't know. I'm not saying she didn't.

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I'm not saying she did. I'm saying I don't know.

My job is to bring the money in. I did not oversee the spending of the money.

Q. But you just testified it was your job to authorize whether an employee could be reimbursed for their expenses.

A. Simple fact, but I did not get into the amounts, and I did not get into the payments and the like. I did not sign checks. I did not [inaudible] the checks. I did not look at the amounts that were being submitted. I simply said, yes, this is okay to reimburse.

Q. And how would she do that, by email?

A. I don't know. Various different ways.

Q. Have you ever accused Marnie of paying an employee an expense that was unauthorized? Strike that. Have you ever accused Marnie of reimbursing an employee for -- for money spent that she wasn't supposed to?

A. I don't recall that, no. Could've, but I don't recall it.

Q. So this is Document 968, and this document, it says, to administrative staff, Marnie, from Daniel Pipes. It's not dated, but it says,

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"November 1st, 2018 was when I received a number of complaints about Gregg. I took the complaints at -- I took the complainants -- I took the complainants at their word and immediately took steps to limit Gregg's role at MEF. In particular, I took away his office key" [as read]. When you said that, you mean that you think Marnie took his office key, correct?

A. Yeah. Not me personally.

Q. Okay. "On March 9th, 2019, responding to a demand from many of you, I reinstated him particularly" [sic] -- I'm sorry. I'm sorry. Strike that. "I reinstated him partially but maintained his limited access to the office. Now, I am happy to report we have completed a comprehensive" -- sorry. I lost my place. "Now, we have completed a comprehensive investigation into Gregg's conduct and have determined that all accusations against Gregg are a hundred percent false. Thus, there is now no reason to maintain the previous restrictions" [as read]. Do you see that?

A. Yep.

Q. Is that true?

A. I don't know if I ever sent this. I don't know when I -- if I did --

Page 381	Page 383
<p>1 MR. CAVALIER: Yeah. Seth, I --</p> <p>2 BY MR. CARSON:</p> <p>3 Q. I mean, is this accurate?</p> <p>4 A. It could be a draft. It could be --</p> <p>5 MR. CAVALIER: Yeah. This may be a draft</p> <p>6 that has privilege issues attached to it.</p> <p>7 MR. CARSON: You guys produced it,</p> <p>8 Document 968.</p> <p>9 MR. CAVALIER: Mark confidential -- yeah,</p> <p>10 you're gonna have to let him read it.</p> <p>11 MR. CARSON: They're all marked</p> <p>12 confidential, every document you gave me.</p> <p>13 MR. CAVALIER: My only point is you're</p> <p>14 gonna have to let us read it here if you want</p> <p>15 us to answer questions about it because I'm not</p> <p>16 sure what it is.</p> <p>17 MR. CARSON: I just read it to you.</p> <p>18 MR. CAVALIER: You read us the top part.</p> <p>19 I wanna see the whole document.</p> <p>20 MR. CARSON: Well, this is the whole</p> <p>21 document.</p> <p>22 MR. CAVALIER: I can only see down to</p> <p>23 "Original". There's obviously more text.</p> <p>24 MR. CARSON: Well, I'll get to that in</p>	<p>1 BY MR. CARSON:</p> <p>2 Q. Well, when --</p> <p>3 A. As of today, I can tell you, yes, I</p> <p>4 have -- we have completed -- I can endorse that as</p> <p>5 of today. I cannot do it as some arbitrary date in</p> <p>6 the past, but today, yes.</p> <p>7 Q. Well, when? When did that happen? When</p> <p>8 did that investigation happen?</p> <p>9 A. I can tell you today that I endorsed it.</p> <p>10 I cannot give you a date.</p> <p>11 Q. I'm asking you when the -- you said that</p> <p>12 your conclusion that everything [unintelligible] is</p> <p>13 based on a comprehensive investigation.</p> <p>14 MR. CAVALIER: So unless and until you let</p> <p>15 us --</p> <p>16 ---</p> <p>17 (Indistinguishable cross-talk.)</p> <p>18 ---</p> <p>19 MR. CAVALIER: -- but if you're gonna</p> <p>20 refer to the document and base your questions</p> <p>21 on it, you need to let us see the document.</p> <p>22 MR. CARSON: I'll get to -- I'll</p> <p>23 [unintelligible].</p> <p>24 BY MR. CARSON:</p>
Page 382	Page 384
<p>1 just a second.</p> <p>2 MR. CAVALIER: It's the same document.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. I'm asking you about this sentence. Is</p> <p>5 this true? Did you perform an investigation --</p> <p>6 ---</p> <p>7 (Indistinguishable cross-talk.)</p> <p>8 ---</p> <p>9 MR. CAVALIER: Seth, he's not gonna answer</p> <p>10 questions on a --</p> <p>11 MR. CARSON: I'm not asking about the</p> <p>12 document then [unintelligible].</p> <p>13 BY MR. CARSON:</p> <p>14 Q. Did you complete a comprehensive</p> <p>15 investigation to Gregg's conduct and determine that</p> <p>16 all accusations against Gregg are a hundred percent</p> <p>17 false? Did you do that?</p> <p>18 A. I --</p> <p>19 MR. CAVALIER: You're asking at any time,</p> <p>20 at any point in the universe?</p> <p>21 MR. CARSON: Sure.</p> <p>22 THE WITNESS: At some point, yes. When</p> <p>23 this was written, I don't know. I don't know</p> <p>24 if it was sent --</p>	<p>1 Q. When did you complete -- when did you do</p> <p>2 this investigation?</p> <p>3 A. Over the past two years.</p> <p>4 Q. Over the past two years you did an</p> <p>5 investigation?</p> <p>6 A. Since November 1st, so --</p> <p>7 Q. So you've been investigating this matter</p> <p>8 since November 1st, 2018?</p> <p>9 A. Yeah, thanks to you.</p> <p>10 Q. Okay. What did you do to investigate the</p> <p>11 reports of discrimination and harassment in the</p> <p>12 workplace after January 1st, 2019?</p> <p>13 MR. CAVALIER: Object to form.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. What did you do to investigate it? What</p> <p>16 are the steps you took?</p> <p>17 MR. CAVALIER: This is asked and answered.</p> <p>18 MR. CARSON: No, it's not. Yeah, you're</p> <p>19 right. It is, and he said he did nothing.</p> <p>20 MR. CAVALIER: I disagree with your --</p> <p>21 ---</p> <p>22 (Indistinguishable cross-talk.)</p> <p>23 ---</p> <p>24 THE WITNESS: I received no complaints. I</p>

Page 385	Page 387
<p>---  1 received moans about how Gregg is a lousy  2 person, but I received nothing that I was to  3 investigate. I mean, when Tricia says, he  4 doesn't want me here, what am I supposed to  5 investigate?  6 BY MR. CARSON:  7 Q. So you have not investigated this matter  8 since November 2018, correct?  9 A. No, not correct. Investigating it  10 unendingly until November 17th, 2020. Thank you.  11 Q. Okay. So what -- what did you do? Who  12 did you -- I'll get more specific. Did you take any  13 witness statements?  14 A. We have been taking witness statements.  15 We've been reading emails and texts and so forth  16 unendingly --  17 Q. Who did you get witness statements from?  18 A. Would you let me finish?  19 Q. No. Let's just -- let's just take it step  20 by step. Who did you --  21 MR. RIESER: Seth, you can't interrupt  22 him. You really can't.  23 MR. CARSON: No, I can, and, Mr. Rieser,  24 you have no standing to put anything on the</p>	<p>---  1 Q. Mr. Pipes, did you take any witness  2 statements?  3 MR. RIESER: Is it your position you have  4 the right to interject and interfere with the  5 client -- with the deponent's --  6 MR. CARSON: Mr. Rieser, we're gonna go  7 off the record if you're gonna say anything  8 else today.  9 MR. RIESER: I don't agree to go off the  10 record.  11 MR. CARSON: Well, you don't get to agree  12 or not agree. You're not -- you're here to  13 watch. That's it.  14 MR. RIESER: I am representing a defendant  15 in the case.  16 MR. CARSON: Right, exactly, a defendant  17 who's not testifying today, but we're not --  18 look. The question is standing.  19 BY MR. CARSON:  20 Q. Mr. Pipes, did you take any witness  21 statements? It's just a yes or no question.  22 A. Yes.  23 Q. Who? Who'd you take them from?  24 A. I don't remember. There's so many people</p>
Page 386	Page 388
<p>---  1 record today.  2 ---  3 (Indistinguishable cross-talk.)  4 ---  5 MR. CAVALIER: What're you talking about?  6 He's representing Gregg Roman, a defendant in  7 the case.  8 MR. CARSON: Gregg Roman's not on --  9 [unintelligible] not testifying.  10 MR. RIESER: It's -- I --  11 MR. CAVALIER: So what? He's allowed to  12 represent his client.  13 BY MR. CARSON:  14 Q. Anyway, it was a yes or no question. Did  15 you take any witness statements?  16 MR. RIESER: Seth, you're out of control.  17 Your behavior's outrageous.  18 MR. CARSON: Right.  19 ---  20 (Indistinguishable cross-talk.)  21 ---  22 MR. CARSON: Your objection is totally  23 inappropriate.  24 BY MR. CARSON:</p>	<p>---  1 we've talked to.  2 Q. Well, name one person that you took it  3 from.  4 A. I am not --  5 Q. Tell me one.  6 A. -- go down this path with you, Mr. Carson.  7 We have done enormous amount of research.  8 Q. Did you hire an investigator?  9 A. We did all sorts of things.  10 Q. Yes or no, did you hire an investigator?  11 A. We did not hire an investigator.  12 Q. You're saying you did all sorts of things,  13 but you can't give me one example of something you  14 did, so that's why I'm just trying to drill down on  15 you what your testimony is.  16 A. You've got --  17 Q. So if you've taken a witness statement,  18 tell me a name of somebody. If you've hired  19 investigator, you know, if you've looked at  20 records -- like tell me what you've done to  21 investigate it.  22 A. I was trying to [inaudible] and you  23 interrupted me.  24 Q. Well, let's go step by step. So, witness</p>

Page 389	Page 391
<p>---</p> <p>1 statements, can you name anyone you've taken a</p> <p>2 witness statement from?</p> <p>3 A. We have taken witness statements, yes.</p> <p>4 Q. From who?</p> <p>5 A. I don't wanna tell you.</p> <p>6 Q. You have to tell me.</p> <p>7 A. I don't know why I have to tell you.</p> <p>8 Q. Because it's your deposition. You have to</p> <p>9 tell me.</p> <p>10 A. Well, okay. Danny Thomas.</p> <p>11 Q. You took a witness statement from Danny</p> <p>12 Thomas?</p> <p>13 A. Yeah.</p> <p>14 Q. Anybody else?</p> <p>15 A. Not that I remember.</p> <p>16 Q. Okay. So did you review any records that</p> <p>17 made you determine that everything is a hundred</p> <p>18 percent false regarding Gregg Roman?</p> <p>19 A. Yes.</p> <p>20 Q. What records did you review?</p> <p>21 A. Electronic records of all sorts, emails,</p> <p>22 texts.</p> <p>23 Q. Well, can you think of any specific email</p> <p>24 that you read that indicates that everything that</p>	<p>---</p> <p>1 MR. CAVALIER: You asked him a question.</p> <p>2 This time, he's gonna finish his answer.</p> <p>3 MR. CARSON: No.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. Who said that she wasn't troubled?</p> <p>6 MR. CAVALIER: Daniel --</p> <p>7 ---</p> <p>8 (Indistinguishable cross-talk.)</p> <p>9 ---</p> <p>10 MR. CAVALIER: He is directly responding</p> <p>11 to your question.</p> <p>12 ---</p> <p>13 (Indistinguishable cross-talk.)</p> <p>14 ---</p> <p>15 THE WITNESS: We have --</p> <p>16 BY MR. CARSON:</p> <p>17 Q. Mr. Pipes, who said she wasn't troubled?</p> <p>18 I'm asking about what you just said.</p> <p>19 A. You're not interrupting me.</p> <p>20 MR. CAVALIER: You can ask him when he's</p> <p>21 finished his answer.</p> <p>22 MR. CARSON: He is finished his answer.</p> <p>23 MR. CAVALIER: No, he's not. Clearly,</p> <p>24 he's not.</p>
Page 390	Page 392
<p>---</p> <p>1 Gregg Roman that was --</p> <p>2 ---</p> <p>3 (Indistinguishable cross-talk.)</p> <p>4 ---</p> <p>5 BY MR. CARSON:</p> <p>6 Q. Let me finish my question. Can you think</p> <p>7 of any document that you read or reviewed at any</p> <p>8 time that indicates that everything, all allegations</p> <p>9 against Gregg Roman, are a hundred percent false?</p> <p>10 A. It is the sum of evidence. We can look at</p> <p>11 three incidents in particular. Since we're</p> <p>12 discussing Ms. Barbounis, we can go over the Israel</p> <p>13 one.</p> <p>14 Q. We can go over what?</p> <p>15 A. We can go over the Israel one since</p> <p>16 Ms. Barbounis is the topic today. She -- we have</p> <p>17 texts from her saying there was no -- nothing</p> <p>18 happened in Israel. Right contemporaneous, we have</p> <p>19 statements by people who met her at that time who</p> <p>20 said she was not troubled.</p> <p>21 Q. Who? Who said that? Who said she wasn't</p> <p>22 troubled?</p> <p>23 A. We have -- don't interrupt.</p> <p>24 Q. Mr. Pipes --</p>	<p>---</p> <p>1 BY MR. CARSON:</p> <p>2 Q. Who testified that -- who told you that</p> <p>3 she was --</p> <p>4 ---</p> <p>5 (Indistinguishable cross-talk.)</p> <p>6 ---</p> <p>7 MR. CAVALIER: Either withdraw your</p> <p>8 question --</p> <p>9 THE WITNESS: I'm not dealing with this.</p> <p>10 MR. CAVALIER: -- or let him answer it.</p> <p>11 MR. CARSON: We have to go off the record.</p> <p>12 The witness is making a phone call.</p> <p>13 MR. CAVALIER: I don't agree to go off --</p> <p>14 ---</p> <p>15 (Indistinguishable cross-talk.)</p> <p>16 ---</p> <p>17 THE WITNESS: -- because you're not</p> <p>18 letting me say what I wanna say.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Who you gonna call?</p> <p>21 A. I'm not calling anyone. I was gonna read</p> <p>22 the news, and I'm not gonna do --</p> <p>23 ---</p> <p>24 (Indistinguishable cross-talk.)</p>



Page 393	Page 395
<p>1 --- 2 --- 3 MR. CAVALIER: Seth, you asked him the 4 question, what did he look at to determine that 5 the allegations were false. He was in the 6 middle of an answer, and you cut him off. 7 MR. CARSON: He said that he talked to 8 witnesses who said that Lisa wasn't troubled, 9 and my simple question is, who were they? 10 MR. CAVALIER: No. You asked him what he 11 did. He was telling you what he did, and then 12 you decided to interject and interrupt with a 13 new question. You've gotta let him finish his 14 answer. 15 MR. CARSON: -- because I wanna know who 16 he spoke to, who these witnesses -- 17 MR. CAVALIER: Well, you can ask him who 18 he spoke to after he's done his answer, but 19 you're not gonna cut him off in the middle and 20 make his answer look incomplete when he's 21 answered -- 22 --- 23 (Indistinguishable cross-talk.) 24 --- MR. CARSON: I am, actually, because --</p>	<p>1 --- 2 --- 3 BY MR. CARSON: 4 Q. Who told you that Ms. Barbounis wasn't 5 troubled? 6 MR. CAVALIER: Seth, I mean, I can't be 7 any more clear with you. 8 MR. CARSON: Yeah. I'm not gonna be any 9 more clear, either. I mean, we're just gonna 10 end up doing this all again tomorrow, I think, 11 right, or another day, and it's crazy because 12 it could easily get done today. 13 MR. CAVALIER: Seth, just because -- 14 --- 15 (Indistinguishable cross-talk.) 16 --- 17 MR. CAVALIER: Just because you don't like 18 the answer to a question doesn't -- 19 MR. CARSON: I have no problem with the 20 answer, but we're not -- he's just sitting 21 there generally -- I looked at a lot of 22 documents. I talked to witnesses who said 23 this. If he's gonna say that he spoke to 24 witnesses, just name them. MR. CAVALIER: The question is, what did</p>
Page 394	Page 396
<p>1 --- 2 --- 3 (Indistinguishable cross-talk.) 4 --- 5 MR. CARSON: Okay. All right. So, what, 6 you guys are walking out? 7 MR. CAVALIER: No. We're sitting here, 8 and we're telling you we're ready to finish our 9 answer whenever you're ready to allow us to do 10 so. 11 MR. CARSON: I'll withdraw the question. 12 BY MR. CARSON: 13 Q. Mr. Pipes, who did you -- who told you 14 that Ms. Barbounis was not troubled? 15 MR. CAVALIER: That's not gonna work this 16 time. 17 MR. CARSON: There's no question pending 18 now. Who told you that Ms. Barbounis -- 19 MR. CAVALIER: -- was an answer pending 20 that he was halfway through. 21 MR. CARSON: I withdrew the question. 22 It's not a question anymore. 23 MR. CAVALIER: It doesn't matter. 24 --- (Indistinguishable cross-talk.)</p>	<p>1 --- 2 you do -- 3 MR. CARSON: That wasn't actually the 4 question. 5 MR. CAVALIER: -- to determine the 6 allegations were false? 7 MR. CARSON: No, that wasn't the question. 8 That's not the pending question. The question 9 was, did you look at any documents? 10 MR. CAVALIER: That was not the question. 11 MR. CARSON: That was the last question I 12 asked. Do you wanna check? What happens when 13 I'm right? Are you gonna let me continue my 14 deposition? 15 MR. CAVALIER: You can do whatever you 16 want, but he's entitled to finish his answer, 17 Seth. I don't know how many different ways I 18 can say it. 19 MR. CARSON: Well, answering the question 20 that I ask. You're right. 21 BY MR. CARSON: 22 Q. So what documents did you look at? 23 MR. CAVALIER: You can finish your answer, 24 Daniel, until Seth cuts you off again and -- ---</p>

Page 397	Page 399
<p>1 (Indistinguishable cross-talk.)</p> <p>2 ---</p> <p>3 MR. CAVALIER: -- waste another five</p> <p>4 minutes.</p> <p>5 MR. CARSON: I mean, you guys are just</p> <p>6 making it so we're gonna have to come back and</p> <p>7 do this all over again, and it sucks, but, you</p> <p>8 know, whatever.</p> <p>9 THE WITNESS: We did research, not all by</p> <p>10 me personally, into electronic communications,</p> <p>11 talking to people who met her.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. Who?</p> <p>14 A. And also we reviewed the social media.</p> <p>15 Q. Okay. What accounts?</p> <p>16 A. And we looked -- we talked to people who</p> <p>17 knew her --</p> <p>18 Q. You said that already.</p> <p>19 A. No. So we did a lot of research into what</p> <p>20 happened in -- and her response in --</p> <p>21 Q. I didn't ask you what her response was. I</p> <p>22 said, what documents did you look at?</p> <p>23 A. Emails, texts, social media. Profusely.</p> <p>24 Q. Okay. Who did you talk to that said that</p>	<p>1 you've seen these statements, correct?</p> <p>2 MR. CAVALIER: To the extent that you have</p> <p>3 document requests out that are responsive,</p> <p>4 which, by the way --</p> <p>5 ---</p> <p>6 (Indistinguishable cross-talk.)</p> <p>7 ---</p> <p>8 MR. CARSON: I'm requesting specific</p> <p>9 documents that I didn't know existed that are</p> <p>10 absolutely responsive to our request that</p> <p>11 weren't produced.</p> <p>12 ---</p> <p>13 (Indistinguishable cross-talk.)</p> <p>14 ---</p> <p>15 THE COURT REPORTER: Stop! Seriously --</p> <p>16 MR. CAVALIER: Responses to your requests</p> <p>17 are not due yet.</p> <p>18 MR. CARSON: Yeah. My first ones are due</p> <p>19 six months ago. Mr. Pipes --</p> <p>20 MR. CAVALIER: -- responsive to your first</p> <p>21 ones.</p> <p>22 BY MR. CARSON:</p> <p>23 Q. Mr. Pipes, are you a hundred percent sure</p> <p>24 that you've read statements from people that saw</p>
Page 398	Page 400
<p>1 ---</p> <p>2 she was not affected by anything?</p> <p>3 A. People that she met the next day in</p> <p>4 Israel.</p> <p>5 Q. Who? Who are they?</p> <p>6 A. I can't provide you with the names.</p> <p>7 Q. Why?</p> <p>8 A. I don't know them. I don't remember.</p> <p>9 Q. You don't know -- you don't know their</p> <p>10 names, right?</p> <p>11 A. I've seen the names. I -- I am not --</p> <p>12 Q. Are you producing them as witnesses in</p> <p>13 this case?</p> <p>14 MR. CAVALIER: Objection.</p> <p>15 BY MR. CARSON:</p> <p>16 Q. Have you taken a declaration or a</p> <p>17 statement for any of these people?</p> <p>18 A. Yes, we've taken statements.</p> <p>19 Q. You have?</p> <p>20 MR. CARSON: All right. So, Jon, please,</p> <p>21 can you turn over these statements that he's</p> <p>22 testifying about?</p> <p>23 MR. CAVALIER: As I've told you before --</p> <p>24 BY MR. CARSON:</p> <p>Q. You're testifying today under oath that</p>	<p>1 ---</p> <p>2 Ms. Barbounis the next day that -- where she said</p> <p>3 she was just fine?</p> <p>4 A. First of all, these are brand new, so you</p> <p>5 couldn't have had them six months ago.</p> <p>6 Q. My question was, are you a hundred percent</p> <p>7 sure that you've read statements from people who saw</p> <p>8 Ms. Barbounis the next day who said that she was</p> <p>9 just fine? Are you sure that you've read those</p> <p>10 statements? It's a yes or no question.</p> <p>11 A. Secondly, I'm not sure --</p> <p>12 Q. Mr. Pipes -- Mr. Pipes, I asked you a</p> <p>13 simple yes or no question. Are you sure that you've</p> <p>14 read these statements that you're testifying about?</p> <p>15 A. Secondly, I'm not sure if I read them or</p> <p>16 they were read to me.</p> <p>17 Q. Okay. If they were read to you, do you</p> <p>18 know who read them to you?</p> <p>19 A. Thirdly, I'm not sure whether they met her</p> <p>20 exactly the next day or the day after that, so I'm</p> <p>21 vague on this. This is not something I know in</p> <p>22 detail.</p> <p>23 Q. Are you sure that you've heard or read</p> <p>24 these statements?</p> <p>A. I'm sure that there are statements about</p>

Page 401	Page 403
<p>1 the state of how Lisa appeared and acted in the</p> <p>2 aftermath of that evening.</p> <p>3 Q. And they're from people who were in</p> <p>4 Israel?</p> <p>5 A. People who were in Israel.</p> <p>6 Q. Okay.</p> <p>7 MR. CARSON: Okay. Like I said, Jon, you</p> <p>8 guys gotta turn them over if you have them.</p> <p>9 MR. CAVALIER: You're not getting a</p> <p>10 dispute from me. I agree with you. They will</p> <p>11 be turned over in due course in accordance</p> <p>12 with --</p> <p>13 MR. CARSON: I mean, due course would've</p> <p>14 been like seven months ago, I think.</p> <p>15 ---</p> <p>16 (Indistinguishable cross-talk.)</p> <p>17 ---</p> <p>18 MR. CAVALIER: -- seven months ago that</p> <p>19 didn't exist two weeks ago, but we'll leave</p> <p>20 that to the discovery practice and the federal</p> <p>21 rules, as I said.</p> <p>22 BY MR. CARSON:</p> <p>23 Q. 968, memo from Mr. Pipes. So, next, we're</p> <p>24 gonna look at -- we'll get back to this memo. So</p>	<p>1 BY MR. CARSON:</p> <p>2 Q. So here you said that he's --</p> <p>3 MR. CAVALIER: No. I told you we're not</p> <p>4 answering questions about --</p> <p>5 MR. CARSON: Well, I'm gonna put the</p> <p>6 question on the record, and you can object to</p> <p>7 it, but we're gonna get an answer to it one</p> <p>8 day.</p> <p>9 MR. CAVALIER: Well, for someone who's</p> <p>10 complaining about lack of time --</p> <p>11 BY MR. CARSON:</p> <p>12 Q. "Now, the year is up, and I am pleased to</p> <p>13 inform you that he has learned his lesson. I found</p> <p>14 no -- I have found no fault in his work, and no one</p> <p>15 on the staff has complained about his actions.</p> <p>16 Therefore, I am asking him to begin" [as read] -- so</p> <p>17 you see the problem here, right, Mr. Pipes?</p> <p>18 MR. CAVALIER: Daniel, do not --</p> <p>19 ---</p> <p>20 (Indistinguishable cross-talk.)</p> <p>21 ---</p> <p>22 MR. CAVALIER: -- not to answer any</p> <p>23 questions about this document --</p> <p>24 ---</p>
Page 402	Page 404
<p>1 here's the memo that you wrote where you said you</p> <p>2 did a investigation and you found a hundred percent</p> <p>3 sure, and then here's another one where it says the</p> <p>4 exact same thing, right, only here it says --</p> <p>5 MR. CAVALIER: We're now back on a</p> <p>6 document that you will not let us read in full.</p> <p>7 MR. CARSON: This is the whole document.</p> <p>8 MR. CAVALIER: So let us read it.</p> <p>9 MR. CARSON: You can read it.</p> <p>10 MR. CAVALIER: Yeah. So I don't -- now</p> <p>11 that I recognize this, I don't know why it was</p> <p>12 produced. If it was, it was inadvertent, and</p> <p>13 we're objecting to it on the grounds of</p> <p>14 attorney-client privilege.</p> <p>15 MR. CARSON: It's not attorney-client</p> <p>16 privilege. It's a document that's addressed to</p> <p>17 Marnie Meyer.</p> <p>18 MR. CAVALIER: It was never sent. I don't</p> <p>19 know why this was produced. I didn't produce</p> <p>20 it, but we're not answering questions about it,</p> <p>21 and we're gonna demand that it be returned to</p> <p>22 us.</p> <p>23 MR. CARSON: Yeah. You're gonna get an</p> <p>24 argument on that one.</p>	<p>1 (Indistinguishable cross-talk.)</p> <p>2 ---</p> <p>3 MR. CARSON: Objection, privilege is the</p> <p>4 way it works.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. You went from finding that he learned his</p> <p>7 lesson to doing a hun -- a comprehensive</p> <p>8 investigation and determining a hundred percent the</p> <p>9 allegations are false. Why -- do you see the</p> <p>10 inherent contradiction in those two statements?</p> <p>11 MR. CAVALIER: Objection. Attorney-client</p> <p>12 privilege. Daniel, I am instructing you not to</p> <p>13 answer any questions about this document.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. Well, we're gonna get to the bottom of it,</p> <p>16 Mr. Pipes, because it's a pretty -- pretty big</p> <p>17 difference between your two statements there.</p> <p>18 ---</p> <p>19 (Indistinguishable cross-talk.)</p> <p>20 ---</p> <p>21 MR. CAVALIER: Object to the editorial.</p> <p>22 Object to the argumentative nature of your</p> <p>23 statement. Object to the mischaracterization.</p> <p>24 MR. CARSON: Are you objecting to a</p>

Page 405	Page 407
<p>---  1 question right now, or you just objecting --  2 MR. CAVALIER: I'm objecting to the fact  3 that you're editorializing and not asking a  4 question.  5 THE WITNESS: I have no problem answering  6 to the alleged discrepancy. Jon --  7 BY MR. CARSON:  8 Q. So June 10th, 2019 --  9 THE WITNESS: Jon, I have no problem  10 answering to the alleged discrepancy.  11 MR. CAVALIER: Daniel, you're not  12 answering any questions about a privileged  13 document. I know that you can answer the  14 questions, and I know the answers are simple,  15 but for the sake of the argument and the  16 preservation of the privilege, I cannot allow  17 you to answer any questions about it.  18 MR. CARSON: He can waive his privilege.  19 It's his privilege. He can waive --  20 MR. CAVALIER: I'm instructing him not to  21 answer the questions about the document.  22 BY MR. CARSON:  23 Q. Are you taking your attorney's advice, Mr.  24 Pipes?</p>	<p>---  1 They told you that Gregg was speculating that the  2 new allegation for Marnie had to do with Gabrielle  3 Bloom, and it had to do with Marnie and Caitriona's  4 father, right?  5 A. It had to do with the rumor, but I don't  6 know what the reference is to what he might've  7 thought. I don't remember that.  8 Q. But you told Marnie that he's speculating  9 that it's about a completely unrelated matter.  10 A. Yeah, I told him that, but I --  11 Q. Yeah.  12 A. Nowhere does it mention Gabrielle Bloom.  13 Q. But that's what you are referencing,  14 right? That's the unrelated matter that he's  15 speculating about.  16 A. I -- I don't agree to that.  17 Q. You're getting the information from  18 Ms. McNulty, correct?  19 A. I don't -- no, not correct. I --  20 Q. Ms. McNulty sent you an email the same day  21 where she told you about Gregg Roman and Matt's  22 conversation. So here you're giving Marnie  23 information about the conversation, but then you're  24 denying that it happened on the other side, right?</p>
Page 406	Page 408
<p>---  1 A. I am.  2 Q. Sorry, what?  3 A. I am, yes. There we go. Rumor was  4 started prior to November 1st.  5 Q. Right. Because of that, you didn't do  6 anything about it, right? He got a reprieve for  7 everything that happened pre November 1st. So do  8 you see this right here?  9 A. Yup.  10 Q. "Marnie, I have just been given news of  11 what appears to be an instance of Gregg's  12 misbehavior that has nothing to do with you. I'd  13 like to confront him with what -- with that and also  14 with what you told me last week. So far, I just  15 told him that you disclosed troubling information to  16 me, but he has no idea what that might be. Indeed,  17 he is speculating that it concerns something  18 entirely unrelated to what you told me" [as read].  19 Right? You were talking about how he thought it was  20 Gabrielle Bloom, right?  21 MR. CAVALIER: Object to form.  22 THE WITNESS: Huh? No.  23 BY MR. CARSON:  24 Q. That's what you're referring to there.</p>	<p>---  1 A. I have no reason to think this has  2 anything to do with Gabrielle Bloom.  3 Q. So what did you mean, then? What was the  4 unrelated matter that he was speculating and  5 concerns [sic]?  6 A. I don't remember what his speculation was.  7 It was wrong, whatever it was.  8 Q. We can't hear you.  9 A. It was wrong, whatever it was.  10 Q. It wasn't Gabrielle Bloom. It was  11 Caitriona Brady, Caitriona Brady's father, and  12 Marnie Meyer, right?  13 A. I believe that the topic of this is the  14 rumor, yes.  15 Q. Is this when Matt Bennett -- Matt  16 Bennett's employment ended? Marnie Meyer,  17 3/11/2019?  18 A. No. He ended on the 8th.  19 Q. So she's telling him, "You're welcome for  20 the laptop," right? She's telling him he can keep  21 the laptop, right?  22 A. Yeah.  23 Q. And the laptop you're referring to was the  24 Apple laptops that everyone was -- that MEF bought</p>



Page 409	Page 411
<p>1 the employees, correct?</p> <p>2 A. No.</p> <p>3 Q. That's not the laptop?</p> <p>4 A. No.</p> <p>5 Q. What's the laptop that he's allowed to</p> <p>6 keep?</p> <p>7 A. The laptop he purchased.</p> <p>8 Q. He purchased it with MEF money, right?</p> <p>9 A. Yes.</p> <p>10 Q. Right, and it was the Apple laptop, right?</p> <p>11 A. I don't know what make it was. He had --</p> <p>12 Q. Can't hear you.</p> <p>13 A. I don't know what make it was. He had a</p> <p>14 choice to buy whatever laptop [inaudible] --</p> <p>15 Q. Did Matt help facilitate everyone using</p> <p>16 Macs in 2019?</p> <p>17 A. I don't know if everybody used Apples.</p> <p>18 Some did. I don't know if --</p> <p>19 Q. And Matt was permitted to keep his laptop,</p> <p>20 right?</p> <p>21 A. He was permitted to keep it on condition</p> <p>22 that he paid the remainder of what he had -- what he</p> <p>23 had -- the time he wasn't there.</p> <p>24 Q. He paid for it? Are you sure about that?</p>	<p>1 two years, 500; and if you're there for three years,</p> <p>2 it's yours.</p> <p>3 Q. But he didn't have to pay anything, right?</p> <p>4 He got to keep it?</p> <p>5 A. No. He had to pay.</p> <p>6 Q. Well, where'd that money come from? Did</p> <p>7 he give you a check?</p> <p>8 MR. CAVALIER: Object to form.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. How'd he pay for it?</p> <p>11 A. Don't know how he paid for it. I have --</p> <p>12 ---</p> <p>13 (Indistinguishable cross-talk.)</p> <p>14 ---</p> <p>15 THE WITNESS: We have an accountant for</p> <p>16 that. I didn't deal with --</p> <p>17 BY MR. CARSON:</p> <p>18 Q. Well, Marnie Meyer was the accountant,</p> <p>19 correct? Right? Marnie Meyer?</p> <p>20 A. Yes.</p> <p>21 Q. So if she says that he got it for free, do</p> <p>22 you have a reason to disagree with that?</p> <p>23 A. Of course. It's not -- that's not what</p> <p>24 she's saying.</p>
Page 410	Page 412
<p>1 A. Yes. That's what she's...</p> <p>2 Q. She's saying, "You're welcome for the</p> <p>3 laptop". Why is she saying "you're welcome" if he</p> <p>4 paid for it?</p> <p>5 A. Because he got some credit for the time he</p> <p>6 was there when he used the laptop. The deal --</p> <p>7 Q. They all got credit. It's called</p> <p>8 depreciation, right?</p> <p>9 MR. RIESER: Seth, please don't interrupt</p> <p>10 him.</p> <p>11 THE WITNESS: If you're there, I think,</p> <p>12 for three years, the laptop is yours, and if</p> <p>13 you leave earlier, then you have to pay -- we</p> <p>14 paid --</p> <p>15 BY MR. CARSON:</p> <p>16 Q. Correct.</p> <p>17 A. -- \$1500 -- don't interrupt.</p> <p>18 Q. That's according to the</p> <p>19 bring-your-own-device agreement, right?</p> <p>20 A. We paid \$1500, if I remember correctly,</p> <p>21 and --</p> <p>22 Q. Right, but he didn't pay anything --</p> <p>23 A. Let me finish. If you're there for one</p> <p>24 year, you would pay a thousand; if you're there for</p>	<p>1 Q. It actually is what she's saying,</p> <p>2 Mr. Pipes, but, Mr. Pipes, do you have any -- what</p> <p>3 reason do you have to believe that he paid for it?</p> <p>4 A. -- "happy to work that out for you."</p> <p>5 Namely, working out what he owed and how that would</p> <p>6 be paid to the Forum.</p> <p>7 Q. "You're welcome for the laptop. I was</p> <p>8 happy to work that out for you. The deal also</p> <p>9 included setting up the docking stations for</p> <p>10 everyone. Although, those did not arrive in time</p> <p>11 for you to do that." What she's saying is she</p> <p>12 worked it out so he didn't have to pay for it. He</p> <p>13 just got to keep it. That's what she's telling him,</p> <p>14 correct?</p> <p>15 A. No.</p> <p>16 Q. Why don't -- what evidence do you have to</p> <p>17 suggest that he actually gave money for the laptop?</p> <p>18 A. Actually, what I think happened is he did</p> <p>19 extra work after he left that paid for some of the</p> <p>20 laptop.</p> <p>21 Q. So he didn't pay for it.</p> <p>22 A. No. He did --</p> <p>23 Q. Right? He got to keep it?</p> <p>24 A. No. He paid for it. Whether he paid for</p>

Page 413	Page 415
<p>---</p> <p>1 it in cash or paid for it in extra work, I'm not</p> <p>2 exactly sure of, but he did not -- he was not handed</p> <p>3 a laptop on leaving. No, no. He had to pay.</p> <p>4 Q. Did Marnie Meyer come to you and get</p> <p>5 permission from you to allow Matt to keep the</p> <p>6 laptop?</p> <p>7 A. I don't remember. You have to --</p> <p>8 Q. Are there -- yes or no, did she, or "I</p> <p>9 don't know"?</p> <p>10 A. I don't know.</p> <p>11 Q. Okay. Is there gonna be communications</p> <p>12 between you and Marnie Meyer where you discuss it?</p> <p>13 MR. CAVALIER: Object to form.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. Yes, no, "I don't know"?</p> <p>16 A. What's the question?</p> <p>17 Q. Did you and Marnie Meyer discuss it</p> <p>18 through WhatsApp or Telegram or texting?</p> <p>19 A. I don't remember.</p> <p>20 Q. You don't remember if you discussed</p> <p>21 whether he was allowed to keep the laptop?</p> <p>22 A. I remember having discussion with her.</p> <p>23 Whether it was this medium or that medium, I have no</p> <p>24 idea. [Inaudible] person. I have no idea.</p>	<p>---</p> <p>1 Q. Did you receive this email?</p> <p>2 A. No.</p> <p>3 Q. Okay.</p> <p>4 MR. RIESER: Luke, can you let us know how</p> <p>5 much time's left?</p> <p>6 THE VIDEOGRAPHER: We will reach the</p> <p>7 seventh hour at 6:53.</p> <p>8 MR. RIESER: Thank you very much.</p> <p>9 THE VIDEOGRAPHER: -- now 6:40, so we</p> <p>10 have --</p> <p>11 MR. CARSON: Yeah. We're gonna go past</p> <p>12 7:00, maybe.</p> <p>13 MR. RIESER: No, we're not. No, we're</p> <p>14 not.</p> <p>15 MR. CARSON: Bill, you can say whatever</p> <p>16 you want. You don't have a client here today.</p> <p>17 MR. CAVALIER: Well, then, I'll say it for</p> <p>18 him. We're not going past 7:00.</p> <p>19 MR. CARSON: I'm letting you know, if we</p> <p>20 don't, we're gonna file a motion to do another</p> <p>21 deposition.</p> <p>22 MR. CAVALIER: You are welcome to file</p> <p>23 that motion.</p> <p>24 MR. CARSON: Yeah. Well, we can because</p>
Page 414	Page 416
<p>---</p> <p>1 Q. So she did come to you and say, hey, can</p> <p>2 he keep the laptop, and you approved it, right?</p> <p>3 A. I -- I remember something about Matt and</p> <p>4 his laptop and his doing [inaudible] --</p> <p>5 THE COURT REPORTER: Hold on. There's</p> <p>6 like a bunch of shuffling going on.</p> <p>7 BY MR. CARSON:</p> <p>8 Q. Go ahead, Mr. Pipes. What's your answer?</p> <p>9 A. I remember there was some discussion of</p> <p>10 Matt's laptop, and we made some kind of arrangement</p> <p>11 to decrease what he owed the Forum [inaudible] --</p> <p>12 Q. Can't hear you because of the shuffling.</p> <p>13 A. -- and that, I think, is the reference to</p> <p>14 the docks that hadn't arrived yet, that he was gonna</p> <p>15 be working on that. But, no, he was not gifted a</p> <p>16 1500-dollar contribution towards a laptop. In so</p> <p>17 far as he didn't pay that back, he earned it some</p> <p>18 other way by doing extra work after he left the</p> <p>19 Forum because he was the tech guy, and he knew what</p> <p>20 was going on in a way that no one else did, and we</p> <p>21 needed him for that help.</p> <p>22 Q. Here's an email dated April 23rd, 2019,</p> <p>23 right?</p> <p>24 A. Yeah.</p>	<p>---</p> <p>1 there's a counterclaim, so we actually get</p> <p>2 another seven hours on the counterclaim, but we</p> <p>3 also get it because of the total misconduct</p> <p>4 that we had today.</p> <p>5 MR. RIESER: The only misconduct is from</p> <p>6 you, Seth.</p> <p>7 MR. CARSON: Bill, I don't know what you</p> <p>8 think you're doing talking on the record.</p> <p>9 You're here to observe, and that's it.</p> <p>10 MR. CAVALIER: You realize he's allowed to</p> <p>11 ask questions of this witness if he wants --</p> <p>12 MR. CARSON: No. He can ask questions.</p> <p>13 He can't object on his behalf. He doesn't</p> <p>14 represent him.</p> <p>15 MR. RIESER: I'm within my rights, Seth.</p> <p>16 MR. CARSON: No, you're not. You don't</p> <p>17 represent the witness. You can't enter</p> <p>18 objections on behalf of someone you don't</p> <p>19 represent.</p> <p>20 MR. RIESER: I'm --</p> <p>21 MR. CARSON: I don't know why you would</p> <p>22 think you can.</p> <p>23 MR. RIESER: Okay. You wanna keep barking</p> <p>24 at me, that's fine.</p>

Page 417	Page 419
<p>---</p> <p>1 BY MR. CARSON:</p> <p>2 Q. Okay. So, here, Marnie Meyer is sending</p> <p>3 an email to you, right, Mr. Pipes?</p> <p>4 A. Yep.</p> <p>5 Q. "Thanks for allowing me to weigh in on</p> <p>6 this. The final note I have is regarding the</p> <p>7 foundations. Matt mentioned a website we used to</p> <p>8 belong to that would allow us to do research -- to</p> <p>9 research other foundations. I was interested in</p> <p>10 playing with that idea and seeing if we could stir</p> <p>11 up additional funds. I was figuring I would work</p> <p>12 with Marc. I know he's got a lot on his plate and</p> <p>13 deadlines sometimes always get -- get away from him.</p> <p>14 I would look to organize things a bit and then try</p> <p>15 to reuse what he's already created to apply other</p> <p>16 foundations. Just a thought, but something should</p> <p>17 definitely -- but someone should definitely help him</p> <p>18 with the timeliness, et cetera" [as read]. Do you</p> <p>19 remember receiving this email?</p> <p>20 A. No.</p> <p>21 Q. You don't?</p> <p>22 A. Why would I remember some random email</p> <p>23 from two years ago?</p> <p>24 Q. I don't know. Do you remember it, yes or</p>	<p>---</p> <p>1 Q. I know that's what you think.</p> <p>2 A. Which she did not do. I am not gonna</p> <p>3 spend my entire time tracing down every random</p> <p>4 rumor.</p> <p>5 Q. Yeah. "She was disappointed that she</p> <p>6 never got the chance to show her stuff. She's</p> <p>7 disappointed that she did not receive a salary</p> <p>8 increase," and then I think you say, "She will get</p> <p>9 one now," correct?</p> <p>10 A. Correct.</p> <p>11 Q. So you are copying something that Marnie's</p> <p>12 telling you, and then you are responding to it,</p> <p>13 correct?</p> <p>14 A. Yep. She got a raise.</p> <p>15 Q. Okay. "You mentioned finding her</p> <p>16 'standoffish,' and I think that she can" -- this is</p> <p>17 Marnie to you -- "and I think that she can be as</p> <p>18 well, but she's an introverted person so much so</p> <p>19 that she brought that up at her interview. She</p> <p>20 actually has a great personality, but if you are not</p> <p>21 around her much, you may not get a chance to see</p> <p>22 that. My point is that I feel that in time you'll</p> <p>23 get to know her better and see her as less</p> <p>24 standoffish and that I think she's earned a shot"</p>
Page 418	Page 420
<p>---</p> <p>1 no?</p> <p>2 A. No.</p> <p>3 Q. How about -- do you remember responding?</p> <p>4 A. No.</p> <p>5 Q. Meetings with Matt?</p> <p>6 A. No.</p> <p>7 Q. "Tricia: I know that she wants the chance</p> <p>8 to move up. I also know that, in preparation for</p> <p>9 her yearly review, she had prepared a spreadsheet to</p> <p>10 show how she had advanced and the events gig far and</p> <p>11 beyond what Eman had ever done with it" [as read].</p> <p>12 Did you ever interview Eman about Gregg Roman?</p> <p>13 A. No.</p> <p>14 Q. Why not?</p> <p>15 A. Why should I?</p> <p>16 Q. Well, people brought it to your attention</p> <p>17 that Eman had complained about him, right?</p> <p>18 A. I never heard any.</p> <p>19 Q. You never saw any emails where people</p> <p>20 brought it to your attention that Eman complained</p> <p>21 about him?</p> <p>22 A. No. Anyway, the key point is not whether</p> <p>23 I solved rumors; it's whether Eman herself comes to</p> <p>24 me and tells me she's got a problem.</p>	<p>---</p> <p>1 [as read]. You responded, "She has to show some</p> <p>2 personality around me to see her beyond the confines</p> <p>3 of her events at work. For example, since the Matt</p> <p>4 resignation, I have heard from Lisa and yourself</p> <p>5 about the current situation, but not from Tricia"</p> <p>6 [as read]. In fact, Tricia sent you several emails,</p> <p>7 right, about it?</p> <p>8 A. At this time I don't know.</p> <p>9 Q. Well, we've looked at a bunch of them</p> <p>10 today, correct?</p> <p>11 A. They were in April and June, if I</p> <p>12 remember.</p> <p>13 Q. April, May, and June. Every month.</p> <p>14 A. This is February. I don't remember</p> <p>15 anything from February.</p> <p>16 Q. Okay. So she never sent you anything</p> <p>17 before April, May, June?</p> <p>18 A. Anyway, there was not -- I was not asking</p> <p>19 her to moan about Gregg some more. I was asking her</p> <p>20 to show some interest and energy about the Forum as</p> <p>21 a whole, which she didn't do.</p> <p>22 Q. We can skip down. "Lisa and projects:</p> <p>23 Frankly, I don't think she knows enough yet.</p> <p>24 Perhaps with time. So I will suggest to her that</p>

Page 421	Page 423
<p>---  1 she take part in the project conference calls, be  2 cc'd on correspondence, and so forth. But, for now,  3 it's best to stick with Gregg. As you may recall,  4 with only one exception, all five other directors,  5 when asked in November, said they are fine working  6 with him, and the sixth had mild problems" [as  7 read]. So your response was --  8 A. No. That was me writing.  9 Q. What'd you say? This is you writing now?  10 A. It's me, yeah. I think --  11 Q. And then who's this?  12 A. Judging by the purple, that's Marnie.  13 Q. Okay. So is it correct that Marnie is the  14 purple, and you're the black in these --  15 ---  16 (Indistinguishable cross-talk.)  17 ---  18 BY MR. CARSON:  19 Q. Sorry?  20 A. It's the logic of this, yes. I don't  21 remember it, but looking at it now, yeah.  22 Q. So Marnie says, "My thoughts are not so  23 much as who likes him or who doesn't, but that it  24 would be natural for his work with the c4 to take</p>	<p>---  1 mean that they're related by definition?  2 A. No.  3 MR. CAVALIER: Object to form.  4 BY MR. CARSON:  5 Q. I'm asking you, what does it mean?  6 A. It means that the c4 requires a c3, but  7 it's a separate organization legally and  8 organizationally. Gregg was gonna be there without  9 any staff whatsoever. All the staff was gonna  10 remain at the c3. He would be at the c4, but he  11 would be asked to help with fundraising for the --  12 and other activities for the c3 on a friendly basis.  13 Q. What does it mean that c4 is a derivative  14 of c3?  15 A. I just wrote it. Without the c3, it is  16 nothing. You have to have the c3 to justify the c4.  17 Q. Is that a legal thing? You're not allowed  18 to have a c4 without a c3?  19 A. Effectively, you can't have a c4 without a  20 c3. People who like the c3, who like what we're  21 doing, who have money that they are giving to  22 political candidates will -- who know who we are,  23 who know what we stand for will give to the c4  24 because they're confident of who we are and what we</p>
Page 422	Page 424
<p>---  1 precedence over his work with the c3." And you  2 said, "See above on this." "I do see him in what  3 you see -- I do see in him what you see, that he's  4 creative and has a lot of great ideas, but I believe  5 the focus that he does gives to the projects and the  6 c3 will mostly be centered around him" [as read].  7 Who's "him" there? Is that Gregg Roman?  8 A. Presumably.  9 Q. And up here, you wrote, "I expect it will  10 be largely or wholly the c4, but the c4 is a  11 derivative of the c3. Without the c3, it is  12 nothing. So Gregg understands he needs to help out.  13 Also, this justifies his high salary." So what do  14 you mean when you said that the c4 is a derivative  15 of the c3?  16 A. Without the c3, it is nothing.  17 Q. The c4 wouldn't exist without the c3.  18 A. Right.  19 Q. They're related, correct?  20 A. No.  21 MR. CAVALIER: Object to form.  22 BY MR. CARSON:  23 Q. Well, what does that mean? If one is --  24 if one can't exist without the other, doesn't that</p>	<p>---  1 stand for. If they didn't know who we were and what  2 we stood for, they would never give money to the c4.  3 Q. Mr. Pipes, I don't know the answers to  4 these questions. I'm asking, like, if I wanted to  5 go open a c4, can I do that, or do I have to open a  6 c3 first?  7 A. You can do it, but you won't have any  8 takers because nobody knows who you are politically  9 and what you stand for and who you're gonna give  10 money to, who you're gonna support, whereas --  11 Q. So --  12 A. -- Forum has a profile, is known, and  13 therefore, if you like what the Middle East Forum is  14 doing, then the c4 is a way for you to entrust your  15 money because you don't follow -- you, the donor,  16 don't follow politics that closely, and you entrust  17 it to someone at a c4 who does follow it closely and  18 can figure out which races are important and which  19 ones are not and the like.  20 Q. So the c3 -- I'm sorry -- the c4 that  21 Mr. -- that you guys were considering starting was  22 going to be connected to the Middle East Forum c3?  23 A. No, not gonna be connected.  24 Q. "Without the c3, it is nothing." I guess</p>



Page 425	Page 427
<p>---</p> <p>1 I just don't understand what you mean.</p> <p>2 A. I just explained.</p> <p>3 Q. What's the -- go ahead.</p> <p>4 A. If you have -- in other words, if the --</p> <p>5 if we go to potential donors and say, hi, you like</p> <p>6 the c3. You give money to the c3. Now, do you have</p> <p>7 another pot of money, not tax-deductible, that you</p> <p>8 give to candidates? Give some of it to us, and</p> <p>9 we'll direct it towards the campaigns -- not</p> <p>10 candidates, but campaigns -- that you will like</p> <p>11 because you like what we do, and we can do it</p> <p>12 because we're specialized. We know the ins and outs</p> <p>13 of these campaigns in a way you don't. So rather</p> <p>14 than you bumble around, giving away money you're not</p> <p>15 quite sure where to give it, give it to us, and we</p> <p>16 know what to do with it.</p> <p>17 Q. So who does the money go to, the c4 or the</p> <p>18 c3?</p> <p>19 A. Some money goes -- tax-deductible money</p> <p>20 goes to the c3, and non-tax-deductible money goes to</p> <p>21 the c4.</p> <p>22 Q. But the rule is that donations to a c4 are</p> <p>23 taxable, and donations to a c3 are not?</p> <p>24 A. Correct, as far as I understand it.</p>	<p>---</p> <p>1 MR. CAVALIER: Well, I don't think that's</p> <p>2 correct, but, I mean --</p> <p>3 MR. CARSON: It is correct.</p> <p>4 MR. CAVALIER: To the extent we're going a</p> <p>5 minute beyond 6:53 -- which I'm not saying</p> <p>6 we're gonna do -- we're gonna need a</p> <p>7 representation from you that the remaining time</p> <p>8 that you have is extraordinarily short. If you</p> <p>9 wanna go for another five minutes in lieu of</p> <p>10 filing your motion, maybe we can make an</p> <p>11 agreement, but if you're just going on</p> <p>12 willy-nilly until you feel like stopping, we're</p> <p>13 not doing that.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. Why did you say it didn't say it was the</p> <p>16 derivative, because it said the c4 is a derivative</p> <p>17 of the c3, right?</p> <p>18 A. I've explained it twice. Yes.</p> <p>19 Q. So the c3 that you're referencing there is</p> <p>20 the Middle East Forum, correct?</p> <p>21 A. Yes.</p> <p>22 Q. So can you read this real quick, please?</p> <p>23 This will be my last question.</p> <p>24 A. Make it larger. Who is this to who?</p>
Page 426	Page 428
<p>---</p> <p>1 Q. Okay. So the c4 that you guys were</p> <p>2 considering opening was gonna be a derivative of the</p> <p>3 Middle East Forum, though, correct? That's what you</p> <p>4 meant by that?</p> <p>5 A. I believe it's 6:50, and I'm done.</p> <p>6 Q. My question's pending. The c4 that you</p> <p>7 guys were considering starting was going to be a</p> <p>8 derivative of the Middle East Forum; is that --</p> <p>9 MR. CAVALIER: I'm gonna object to form.</p> <p>10 "A derivative" is not what the document said.</p> <p>11 MR. CARSON: What'd it say?</p> <p>12 THE WITNESS: It's 6:50 p.m., and I</p> <p>13 believe I'm done.</p> <p>14 ---</p> <p>15 (Indistinguishable cross-talk.)</p> <p>16 ---</p> <p>17 THE WITNESS: What'd you say, Jon?</p> <p>18 MR. CAVALIER: 6:53.</p> <p>19 THE WITNESS: Oh, okay.</p> <p>20 MR. CARSON: I mean, if you guys really</p> <p>21 are gonna bounce out at exactly seven hours, I</p> <p>22 mean, I'm telling you right now, I'm gonna --</p> <p>23 it's gonna be an issue with me because I gave</p> <p>24 you guys eight and a half hours with Lisa.</p>	<p>---</p> <p>1 Q. So I'll represent to you these are</p> <p>2 messages that you produced that are text messages</p> <p>3 between you and Marnie Meyer. Can you hear where</p> <p>4 she says that Gregg told Matt that he could destroy</p> <p>5 Daniel Pipes? Did you ever talk to Gregg about</p> <p>6 that?</p> <p>7 A. No, I didn't. I told you I don't -- I</p> <p>8 didn't take Matt's rumor mongering seriously. He</p> <p>9 was engaged in so much of this. It reminded me of</p> <p>10 another instance, and this is --</p> <p>11 Q. Okay. Here she says Gregg -- she says she</p> <p>12 just found out that Delaney was afraid to use the</p> <p>13 ladies' room because he would use the TV in his</p> <p>14 office to count how many times a day Eman went to</p> <p>15 the ladies' room. So that's why I asked if you ever</p> <p>16 spoke to Eman.</p> <p>17 A. No, I didn't speak to Eman about this. If</p> <p>18 she had a problem with it, she could've come to me.</p> <p>19 This is rumor mongering.</p> <p>20 Q. So --</p> <p>21 A. Marnie says to -- Marnie says to Eman says</p> <p>22 to me. I mean, what -- hello, if somebody has a</p> <p>23 problem, come to me. And, as you saw, I dealt with</p> <p>24 it expeditiously and rapidly. I cannot deal with</p>

Page 429

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1 rumors.

2 Q. The last question is, is the money that  
3 you're talking about here the health insurance?

4 A. I don't know what this is referencing.

5 Q. Sorry?

6 A. I don't know what this is in reference to.

7 Complicated.

8 Q. Yeah. I don't know either. That's why  
9 I'm asking.

10 A. I don't know what the 207,000 -- I don't  
11 know.

12 Q. The gross is -- well, I guess we can ask  
13 Marnie. All right, whatever. It's 6:54. I'm done.  
14 That was easy, right, Mr. Pipes?

15 A. Oh, yeah.

16 THE COURT REPORTER: All right. We off  
17 the record?

18 MR. CAVALIER: No questions from me.

19 THE VIDEOGRAPHER: The time is 6:55 p.m.  
20 Eastern Time. We are now off the record.  
21 Thank you, Counsels.

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22  
23 (Witness excused.)

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Page 430

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1 (Deposition concluded at 6:55 p.m.)  
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C E R T I F I C A T E  
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I do hereby certify that I am a Notary Public in good standing, that the aforesaid testimony was taken before me, pursuant to notice, at the time and place indicated; that said deponent was by me duly sworn to tell the truth, the whole truth, and nothing but the truth; that the testimony of said deponent was correctly recorded in machine shorthand by me and thereafter transcribed under my supervision with computer-aided transcription; that the deposition is a true and correct record of the testimony given by the witness; and that I am neither of counsel nor kin to any party in said action, nor interested in the outcome thereof.

WITNESS my hand and official seal this 23rd day of November, 2020.

<%signature%>

\_\_\_\_\_  
Notary Public

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INSTRUCTIONS TO WITNESS

- - -

Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition.

It is imperative that you return the original errata sheet to the deposing attorney within thirty (30) days of receipt of the deposition transcript by you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.



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ACKNOWLEDGMENT OF DEPONENT

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I, \_\_\_\_\_, do hereby certify that I have read the foregoing pages 1 to \_\_\_\_ and that the same is a correct transcription of the answers given by me to the questions therein propounded, except for the corrections or changes in form or substance, if any, noted on the attached Errata Sheet.

\_\_\_\_\_  
DATE

\_\_\_\_\_  
SIGNATURE

Subscribed and sworn to before  
me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

My commission expires:

\_\_\_\_\_

\_\_\_\_\_

Notary Public

**WORD INDEX**

&lt; \$ &gt;

**\$14** 160:9, 16 240:3**\$1500** 410:17, 20**\$17** 260:3**\$200,000** 367:10**\$240,000** 38:11**\$27,000** 232:11, 13, 14  
366:13 368:2, 3**\$31** 85:14 95:14, 20  
97:22 98:5 159:3160:7 177:18 217:21  
239:11, 21 340:23**\$31,000** 97:21**\$5,000** 161:2, 13, 15**\$7,000** 272:4 274:6,  
11 281:2, 4, 15 282:6,  
14 283:1 284:8**\$7,500** 272:1 273:2

&lt; 0 &gt;

**000027** 336:21**0005** 218:8**00060** 371:9

&lt; 1 &gt;

**1** 120:22, 22 176:13,  
24 194:4 434:4**1:11** 145:11, 15**1:21** 145:8**1:24** 145:15, 17**10:08** 1:14 5:10**10:35** 37:3**10:45** 37:3, 5**10th** 321:5 347:3, 3  
349:20, 23 352:9, 10  
374:21 405:8**11** 176:5, 13, 24  
242:9, 10, 10 252:10  
408:17**11:20** 75:24**11:31** 75:24**11:34** 189:21 190:7  
242:16 243:2, 3**11:45** 57:19 58:18  
73:11**11:58** 102:8**11th** 50:23 251:19  
264:4 336:20 338:13  
352:10**12** 63:22**12:10** 101:24**12:15** 102:8, 10**122** 3:12**12th** 260:22**13** 239:24**14** 239:23 240:1  
241:10**14th** 260:23 261:3**15** 60:21 242:10**1500-dollar** 414:16**16** 57:17**1650** 1:13 2:9**17** 1:6 251:17, 18**176** 3:15**17th** 5:10 346:7

374:2 385:10

**18** 176:5, 24 251:18

314:5 320:11 345:18

354:21 355:13 362:8

364:4

**1835** 2:3, 14**189** 3:16**18-year-old** 212:15  
214:16**19** 13:13, 14 52:24

314:5 320:12

**19103** 2:4, 9, 15**1994** 10:9, 10, 11**19-page** 52:22**19th** 158:19**1st** 94:3, 14 95:3

103:4, 10 108:1

129:12 141:18, 21

156:23 163:23

170:15, 16, 22 173:7

176:18 177:6, 21

191:4 198:20 228:3

231:17 233:24 234:2

256:3 333:13 380:1

384:6, 8, 12 406:4, 7

&lt; 2 &gt;

**2** 11:11 176:5

253:13

**2:10** 192:1, 4**2:15** 191:15**2:19-cv-05030-GAM**

1:6 5:15

**2:49** 192:4, 6**20** 23:2 434:14**2017** 112:22 328:4  
374:3**2018** 12:12 13:12

89:11, 16, 24 93:20

94:3, 18, 20 95:23

96:4 102:18 103:10

117:24 118:1 119:17

122:9 125:3 131:16

135:11 150:9 153:21

170:15 172:24

176:13, 18 177:21

187:20 189:21

202:16 229:24 230:2

243:22 248:1 249:12

256:4 292:12, 20

321:12 347:17 348:8,

8 349:13 354:18

355:3, 19 364:9

365:16, 19 377:2

380:1 384:8 385:8

**2019** 12:11, 12 13:11

37:16 43:19, 22, 24

83:18 136:16 143:12

158:19 252:10

286:16 293:5 300:23

302:13 303:15, 17, 23

316:18 319:23 321:5

336:4, 20 337:7

338:13 345:18 347:3

349:20, 23 352:9, 9,

10, 10 354:14 355:8

363:19, 21 364:9

371:11 377:2 380:9

384:12 405:8 408:17

409:16 414:22

**2020** 1:6 5:10 34:8,

10 37:16 202:18

385:10 431:11

**207,000** 429:10**21** 292:5**215-391-4790** 2:5**215-569-1999** 2:15**215-665-2000** 2:10**218** 3:17**22** 292:5, 7, 8**23** 292:5, 7**23rd** 293:5 300:23

352:9 414:22 431:11

**240,000** 38:10**242** 3:18**24th** 10:7, 11 318:22**25** 28:21, 23 31:8

54:8

**251** 3:20**26** 10:4 97:23 98:12

321:3, 4 336:5

**275** 3:21**28th** 346:9**292** 3:22**2950** 2:4**29th** 261:6**2nd** 198:21 333:13,  
14, 24

&lt; 3 &gt;

**3** 10:23 11:1, 4, 14,

24 12:6, 23 13:1, 3, 5

15:23 16:11, 15, 24

17:15 18:5 20:11

21:11 25:23 50:24

408:17

**30** 98:8 152:4

229:23 236:14

432:15

**30,800,000-some** 95:20**30th** 99:20**31** 98:18**316** 3:23**320** 3:24**321** 4:4**33,000** 98:9**336** 4:5**34** 93:13**345** 4:6**347** 4:7**354** 4:8**365** 4:9**368** 4:10**371** 4:11**374** 4:12, 13**379** 4:14

&lt; 4 &gt;

**4** 11:9, 14 12:8, 13,  
18, 20 13:9, 10, 23

14:2 15:10, 23 16:5,

23, 24 17:16 18:4 20:10 21:6, 8, 10 24:5, 11, 19 25:23 <b>4:49</b> 316:7, 11 <b>40</b> 160:8 <b>406</b> 4:15 <b>408</b> 4:16 <b>417</b> 4:17 <b>428</b> 4:18 <b>45</b> 60:22 <b>4th</b> 189:20, 21 190:7 228:4 241:20 243:19  < 5 > <b>5:08</b> 316:11, 13 <b>50</b> 365:7 <b>500</b> 345:6 411:1 <b>500-paragraph</b> 86:12 <b>501</b> 10:23 11:1, 4, 9, 11, 14, 14, 24 12:6, 8, 13, 18, 20, 23 13:1, 3, 5, 9, 10, 23 14:2 15:10, 23, 23 16:5, 11, 15, 23, 24, 24 17:15, 16 18:4, 5 20:10, 11 21:6, 8, 10, 11 24:5, 11, 19 25:23, 23 50:24 <b>51</b> 3:11 365:7 <b>515</b> 2:14 <b>52</b> 365:7 <b>54</b> 368:18 <b>5th</b> 94:15 211:23 229:24 230:2 235:13, 22 243:22 248:1 249:11 292:12, 20 316:18 319:23 320:4 321:12 337:6 347:17 348:8 349:13 354:14 363:19, 21 364:9 365:19 371:11  < 6 > <b>6</b> 218:8 365:16 <b>6:40</b> 415:9 <b>6:50</b> 426:5, 12 <b>6:53</b> 415:7 426:18 427:5 <b>6:54</b> 429:13 <b>6:55</b> 429:19 430:1	<b>60</b> 45:3 84:13 365:4 371:9 373:16 <b>63</b> 3:13 <b>65</b> 374:20, 20 <b>6th</b> 94:15 129:12 235:13  < 7 > <b>7</b> 3:5 218:9 <b>7,000</b> 283:22 <b>7:00</b> 415:12, 18 <b>70</b> 45:3 <b>75</b> 3:14 <b>7th</b> 129:12 141:19  < 8 > <b>8</b> 122:9 <b>8th</b> 141:19, 20 408:18  < 9 > <b>9:02</b> 122:9 <b>968</b> 379:22 381:8 401:23 <b>975</b> 121:6 122:4 <b>976</b> 121:6 <b>977</b> 121:6 <b>978</b> 121:6 122:4 <b>990</b> 38:19, 21 43:23, 24 <b>9th</b> 94:16, 17 198:3 229:20 254:1, 6, 7 264:5 336:4 380:9  < A > <b>a.m</b> 1:14 5:10 37:3, 3, 5 75:24, 24 102:8 122:9 145:17 189:24 190:1, 7 243:3, 4 <b>ability</b> 9:5 72:12 284:2 339:12 <b>able</b> 55:5, 20 88:16 89:8 90:1 146:19 241:1 250:5 304:14 <b>abruptly</b> 193:12 <b>absolutely</b> 41:11, 14 42:15 293:1 399:10 <b>abstract</b> 74:6 <b>abuse</b> 222:20 228:9 321:24 349:5 <b>abused</b> 285:11, 14, 19	<b>abusive</b> 219:19 220:6, 14 223:21 224:4, 22 225:6 227:2 321:18 322:8, 11 329:3, 20 330:22 <b>accept</b> 310:2, 10, 16 311:10, 19, 20 <b>acceptable</b> 179:9, 11, 20 180:5, 20, 23, 24 <b>accepted</b> 188:18 225:17 310:11 <b>access</b> 243:6 250:23 362:18 363:15 380:13 <b>accession</b> 342:24 <b>accomplishments</b> 340:6 <b>account</b> 38:23 39:4, 6, 19 <b>accountable</b> 339:16 354:8 <b>accountant</b> 27:8, 9, 12, 13 377:11 411:15, 18 <b>accounting</b> 27:21, 21 28:18 33:4, 9 34:4 <b>accounts</b> 203:24 397:15 <b>accurate</b> 77:12 381:3 432:17 <b>accusation</b> 127:24 <b>accusations</b> 95:22 188:18 202:11 203:18 380:18 382:16 <b>accused</b> 70:24 71:12 170:24 273:8 379:15, 17 <b>accuses</b> 295:10 <b>accusing</b> 245:24 273:23 310:1 <b>acknowledge</b> 188:4 231:4 <b>acknowledged</b> 180:2, 7 183:12 <b>acknowledges</b> 179:8 188:5 <b>acknowledging</b> 259:23 326:8 375:2 <b>ACKNOWLEDGMEN</b>	<b>T</b> 434:1 <b>acquiesce</b> 253:11 <b>acquiesced</b> 253:7 <b>acquiescence</b> 253:15 <b>act</b> 76:17 352:17, 23 <b>acted</b> 171:9 173:16, 16 187:18 188:24 200:24 210:5, 20 255:20 401:1 <b>ACTION</b> 1:1 163:23 211:7 313:5 431:9 <b>actions</b> 161:8 171:10 215:23, 23 246:6 403:15 <b>active</b> 13:3, 4 108:8, 12, 21 109:2 <b>activities</b> 11:18 77:11, 20 186:8, 11 346:4, 5 423:12 <b>activity</b> 79:17 186:14 371:16 <b>actress</b> 79:24 237:2, 6, 9 <b>actual</b> 250:22 295:14 309:22 <b>add</b> 31:12 98:18 114:19 124:5 231:6, 8 <b>added</b> 193:22 <b>addition</b> 241:10 <b>additional</b> 417:11 <b>Additionally</b> 340:3 <b>additions</b> 98:6 <b>addressed</b> 189:17 229:17 234:13 264:6 402:16 <b>addressing</b> 243:19 <b>adequate</b> 92:1 <b>adequately</b> 91:19 <b>adhered</b> 320:5, 18 <b>administration</b> 367:21 <b>administrative</b> 85:4 90:23 336:12 339:21 340:3 367:19 375:8, 9 379:23 <b>administrator</b> 115:24 336:12 <b>admitted</b> 98:23 99:1 275:4, 5
---	--	--	---



<p><b>admitting</b> 275:8  <b>admonished</b> 164:16  <b>advance</b> 188:7, 17, 20  189:4 336:5  <b>advanced</b> 418:10  <b>advances</b> 176:14, 21  177:8 179:6 188:2  194:8, 9 198:14  <b>advice</b> 43:16 49:9  244:19 248:4, 5  405:23  <b>affect</b> 349:2  <b>affection</b> 339:5  <b>affections</b> 315:1  <b>aforementioned</b>  240:17, 18  <b>aforesaid</b> 431:4  <b>aforth</b> 213:19  <b>afraid</b> 428:12  <b>aftermath</b> 401:2  <b>afternoon</b> 173:8  <b>agent</b> 23:10  <b>ago</b> 10:5 39:15, 17,  18, 20 62:14 112:19,  24 114:13 124:3  128:16 160:22 162:9  199:7 223:18 237:12  251:10 260:23 262:2  347:23 357:22 363:6  399:19 400:4 401:14,  18, 19 417:23  <b>agree</b> 6:14, 18 48:10  86:4 192:22 229:16  230:15, 20 240:4  243:1 271:17 315:22  387:9, 11, 12 392:13  401:10 407:16  <b>agreed</b> 5:1 55:24  92:13 183:19 189:10,  11 229:12 252:3  253:16 254:4, 6  289:22 291:8, 15  302:22 321:16  339:19 341:3, 3, 4  <b>agreeing</b> 281:4  <b>agreement</b> 6:7, 8  80:2 129:10 136:11  189:14, 15 234:18  253:15, 19 262:15  323:16 337:20, 21</p>	<p>365:17 366:6 375:7  410:19 427:11  <b>agreements</b> 239:16  291:18  <b>ahead</b> 20:6, 23 32:14  42:17 47:18 49:16,  17 59:19 66:22  85:20 97:18 101:9  118:5 124:5 137:24  163:3 167:13, 19  180:6 202:18 203:8  216:7 218:5 222:14  247:6 260:21 296:6  300:4, 8, 8 302:2  311:9 325:19 414:8  425:3  <b>AIPAC</b> 135:22 183:1  <b>Airbnb</b> 106:16  165:18 168:15  169:12, 19 171:18  <b>al</b> 1:6 5:13  <b>Alana</b> 70:20 80:5, 7,  9, 10, 16 81:5, 10  82:3 132:17 133:4  151:22 152:15  153:18 235:24 236:1  237:4, 11  <b>Albert</b> 9:19, 21, 24  <b>allegation</b> 73:21, 23  109:23 149:5, 8, 10  150:22, 23 188:1  238:16 295:23  301:13 304:8, 10  305:11 306:13, 17, 20  307:2, 8 322:14, 19  350:24 407:2  <b>allegations</b> 70:11  82:2, 9, 11 102:19, 23  109:5 110:21 135:18  150:7, 11 167:11  176:14, 19 182:13  189:22 210:2, 4, 10  212:11 214:8 219:16  234:10 238:17  241:12 256:10, 12  271:22 272:18  307:14 314:13, 18  390:8 393:4 396:5  404:9  <b>allege</b> 302:9 303:7, 15</p>	<p><b>alleged</b> 76:12 169:20  272:3 405:6, 10  <b>allegedly</b> 174:5  338:3 370:4  <b>alleges</b> 193:20  <b>alleging</b> 219:11 295:4  <b>alleviate</b> 340:2  <b>allow</b> 12:7 13:24  166:13 167:18  260:17 300:6 394:8  405:16 413:5 417:8  <b>allowed</b> 12:3 84:6  89:17 116:22, 24  203:6 221:23 222:3  226:4 253:2 254:24  255:9 257:7 259:12  272:21 285:22 286:5  317:8 351:9 358:10  386:11 409:5 413:21  416:10 423:17  <b>allowing</b> 417:5  <b>allude</b> 174:12  <b>alluded</b> 229:20  <b>allying</b> 312:9  <b>amazed</b> 221:7  <b>American</b> 11:20  <b>amount</b> 58:11 98:8  239:24 366:2 388:7  <b>amounts</b> 40:11 379:8,  10  <b>Amy</b> 9:19, 21, 22, 24  27:14, 17, 17, 19, 20  34:21, 23, 24 267:4,  23 268:1, 4, 7  <b>Amy's</b> 35:1, 8  <b>analysis</b> 281:22  <b>angels</b> 134:15 183:10  <b>anger</b> 315:2  <b>angry</b> 308:17 313:24  <b>ANN</b> 2:21  <b>announced</b> 307:18  <b>announcement</b> 334:15  <b>announces</b> 334:20  <b>announcing</b> 243:21  <b>annoyed</b> 314:2  <b>annually</b> 37:14  <b>anonymous</b> 126:16  <b>answer</b> 7:17, 19, 23  8:10, 20 10:22 11:21  13:18 14:4 18:7, 20</p>	<p>19:11, 15, 17 20:4, 5,  6, 23 21:3, 19 22:21  23:3 24:13, 21 26:18  29:17, 19, 20 30:20  31:5, 13 32:7 40:24  41:1 42:19 46:14, 18,  22 47:16 48:1, 5, 22  49:3, 5, 13 51:24  59:22 62:1 66:22  71:10 72:6, 7, 11, 19,  23 73:12, 13, 20  74:13 77:1 80:18  82:23 83:22 84:10  86:11 88:1 91:23  101:19 103:2 105:12  111:18 125:7 133:11  137:16 146:16  151:15, 18 157:4  161:21 166:20, 22, 24  167:5, 21 172:11  177:7 180:1 194:16,  22, 24 195:2, 11  196:14 197:1 200:16  201:11 202:24 203:6  207:21 208:21 212:4  213:3 215:4 216:7  220:22 221:15, 21, 24  222:1, 4, 6 223:5  224:5, 18 226:2, 6, 15  237:20 238:4, 24  244:14, 19, 20 246:9,  12, 14 248:3, 4, 5  257:9, 13, 15, 17, 19,  21 258:4, 6, 13  260:18 265:10 270:1  271:6 273:17 283:5,  9, 15 284:17 291:23  292:1 293:24 295:15  296:3, 6 299:22, 23  300:3, 13, 18, 19  302:2 311:17, 18  315:11 324:3, 18, 20  325:1 326:18, 24  327:12 329:8, 9, 12,  24 330:1, 2, 5, 6, 7, 9,  12 331:13 351:12, 14  352:24 353:6 356:18,  18, 21, 21, 22 357:2, 4,  9, 13, 15 358:4 359:7,  22 360:2, 10, 22</p>
--	--	--	---

<p>361:15, 16 367:6, 6 381:15 382:9 391:2, 21, 22 392:10 393:5, 13, 17, 19 394:8, 18 395:17, 19 396:15, 22 403:7, 22 404:13 405:13, 17, 21 414:8 <b>answered</b> 17:18, 21 18:7 43:2 157:17 200:18 205:20, 20 206:7 210:16 258:5 283:3 284:1 341:24 359:8 362:7 384:17 393:20 <b>answering</b> 19:10 31:2 61:5 73:9 82:13, 19 221:18 223:1, 2 311:8 325:13 327:23 344:13, 18 351:6 357:18 359:2 361:14 396:18 402:20 403:4 405:5, 10, 12 <b>answers</b> 8:1 19:19 48:20 49:8 58:2 223:10 357:18 405:14 424:3 434:5 <b>answer's</b> 18:3 <b>anti-discrimination</b> 245:22 <b>anxious</b> 355:14 <b>anybody</b> 26:2 69:9 104:14 109:1, 13 146:5 183:8, 9 389:14 <b>anymore</b> 13:16 89:18 90:1 247:19 250:6, 23 256:21 258:10 314:7 394:21 <b>anytime</b> 183:8 285:9 328:4 <b>anyway</b> 7:15 29:20 223:20 240:7 386:14 418:22 420:18 <b>apart</b> 134:22 <b>Apologize</b> 37:7 48:11 <b>apology</b> 354:9 <b>apparently</b> 125:9 165:16 204:8 261:8</p>	<p>304:6, 11 347:1 <b>appear</b> 185:17 <b>APPEARANCES</b> 2:1 <b>appeared</b> 134:14 287:1 401:1 <b>appearing</b> 5:20 22:18 247:11 <b>appears</b> 406:11 <b>applaud</b> 218:3 <b>Apple</b> 408:24 409:10 <b>Apples</b> 409:17 <b>application</b> 340:2 <b>applied</b> 334:15, 16 <b>applies</b> 160:4 <b>apply</b> 159:14 334:24 335:3 417:15 <b>approached</b> 13:6 119:18, 20 184:12 <b>appropriate</b> 74:7 245:5, 12, 23 432:6 <b>approval</b> 342:10, 11 <b>approve</b> 37:17 77:12, 13, 16 <b>approved</b> 37:9 414:2 <b>approximately</b> 39:22 <b>apps</b> 111:14 <b>April</b> 94:22 96:1 163:24 168:16 169:9 197:11 293:5 300:23 302:13 303:15, 17, 23 338:9 343:24 346:7 352:9 414:22 420:11, 13, 17 <b>arbitrary</b> 383:5 <b>arcane</b> 184:21 185:7 <b>area</b> 141:10 184:5 <b>argue</b> 204:10 225:17 <b>arguing</b> 164:11 <b>argument</b> 43:13 350:3 402:24 405:15 <b>Argumentative</b> 18:7 237:20 238:5 295:13 296:4 299:2 310:5, 7 356:1 367:4 404:22 <b>arisen</b> 12:17 14:8 <b>arm</b> 193:2, 14 <b>arrangement</b> 151:24 219:7 229:13 414:10 <b>arrangements</b> 165:21,</p>	<p>21 <b>arrive</b> 412:10 <b>arrived</b> 414:14 <b>article</b> 371:12, 18 372:8 373:3, 15 <b>articles</b> 373:4, 14 <b>ascertain</b> 137:4 <b>ascribe</b> 101:12 <b>ascribed</b> 137:6, 18 <b>aside</b> 150:20 152:21 198:15 211:22 <b>asked</b> 13:7, 7 17:17, 21 18:6 82:8 83:16 91:13 95:5 99:20 103:5 119:19 123:7 125:17 140:20 142:3 157:16 162:21, 22, 22 168:5 170:1, 17 193:12 198:23 199:2, 11 203:4 205:19 206:6 208:15 209:14 212:3 217:21 222:2 230:8 251:7 257:5 262:19 264:13, 14 277:24 278:6, 9 283:2 300:2 311:6 324:8 326:4 331:3 335:16, 21 343:10, 13 346:13 354:20 355:4 363:16 384:17 391:1 393:2, 9 396:11 400:11 421:5 423:11 428:15 <b>asking</b> 13:20 16:3 19:13 28:12 33:12 51:17 57:20, 21 61:8, 12 80:13, 14 86:11, 15 87:20 114:9 126:6 166:15 167:15 179:14 196:10 197:16 199:5 223:16 244:17, 18 245:9, 19, 22 264:1 279:4 281:18, 20 299:8 311:8 318:6, 10 329:19 346:22 351:24 352:1 356:19 357:3, 8 358:20 361:3 363:2 382:4, 11, 19 383:11 391:18</p>	<p>403:16 405:3 420:18, 19 423:5 424:4 429:9 <b>asks</b> 98:5 346:23 <b>aspect</b> 129:4 187:16 241:7 <b>aspects</b> 283:18 356:4 <b>aspirations</b> 109:14 <b>ass</b> 212:15 <b>assault</b> 159:10 169:20 174:12 <b>assaulted</b> 97:1, 11 173:23 <b>assent</b> 91:2 <b>assert</b> 244:23 248:6 <b>assistant</b> 111:3, 4 <b>associated</b> 287:17 290:23 <b>ASSOCIATES</b> 2:13 <b>assume</b> 8:11 252:16 <b>assuming</b> 330:17 <b>assurance</b> 127:7 <b>assurances</b> 127:10 <b>assure</b> 240:2 <b>assured</b> 128:10 320:14 <b>attached</b> 178:14, 19 346:13 381:6 432:12 434:8 <b>attempt</b> 137:4 <b>attending</b> 345:21 <b>attention</b> 150:17, 17 164:10 217:7 218:7 249:3 333:4 418:16, 20 <b>attorney</b> 53:10 432:14 <b>attorney-client</b> 402:14, 15 404:11 <b>attorneys</b> 6:6 53:16, 19 64:17 65:3, 7 66:17 75:20 98:3 252:19 <b>attorney's</b> 405:23 <b>attributing</b> 223:22 <b>Audio</b> 3:14, 21 75:23 275:21 276:12 <b>audit</b> 320:24 321:2 <b>authenticate</b> 80:14, 23</p>
---	--	--	---

**authenticity** 79:20, 22  
152:8  
**authority** 89:9  
163:22 339:11  
370:10 375:13  
**authorization** 376:23  
378:5  
**authorize** 278:13  
297:1 377:7 379:5  
**authorized** 375:5  
376:21, 23 377:7  
378:7  
**authorizing** 377:12  
378:22  
**available** 50:17, 19  
262:3 372:20  
**aware** 22:9, 13 62:23  
63:4 64:17 67:15  
76:22 124:12 132:21  
133:1 183:24 190:18  
191:5 201:24 202:2,  
3 279:3 303:16, 20  
309:12 328:15, 20, 23

## &lt; B &gt;

**back** 7:14 14:23  
15:2 23:24 28:20  
32:9 36:15 47:4, 6  
48:7 57:18, 22 58:21  
60:5 73:1 77:15  
83:17, 18 85:5 86:19  
89:10 90:16 92:5, 8,  
9 93:2 95:24 96:3,  
12 101:24 102:15  
106:23, 24 123:22  
145:8 157:4, 6 162:8  
163:24 164:14 172:5  
177:17 191:20 197:4,  
7, 24 198:1, 2 201:19  
208:4 233:24 241:4  
247:7 251:21 252:1  
262:21 263:5, 8, 13  
278:23 280:3 282:16  
304:7 306:12 308:16  
313:9, 16, 24 315:2  
316:14 323:6 324:3  
339:19 348:20  
349:11 397:6 401:24  
402:5 414:17

**background** 74:5  
**backside** 96:5 205:4  
**backstabbing** 309:11  
310:22 343:2, 4  
**bad** 180:11 211:16  
219:24 222:19  
225:11, 16 348:23  
368:11, 13  
**badly** 168:10 338:8  
**bait** 133:7, 9, 10  
135:16  
**baited** 153:8  
**Baldino** 1:15 5:18  
**ballpark** 38:9, 18  
39:22  
**bane** 362:10, 11, 13  
**bank** 39:4, 6  
**bar** 71:14 86:18  
236:13  
**BARBOUNIS** 1:1  
2:22 5:12 6:10 7:5  
13:6 26:6 56:9  
77:14 81:20, 24  
82:12 83:19 84:23  
89:9 90:8 91:21  
92:3, 12 94:21 99:19,  
24 102:24 104:1  
105:9 109:6 113:22  
119:11 154:4 162:23  
165:11 181:14 186:7  
190:3 215:5, 11, 20  
219:14 251:24 260:5  
262:19 264:18 272:4  
273:1, 23 274:3  
280:14 282:5 285:3  
290:11 298:14 305:4  
316:18 317:5 368:16  
371:11 374:3 376:3  
390:12, 16 394:13, 17  
395:3 400:1, 7  
**barking** 416:23  
**barrage** 341:6  
**base** 383:20  
**based** 60:20 62:8  
74:14, 16 92:19 99:8  
103:17 108:18 167:5  
185:16 245:17, 22  
252:4 265:13 272:7,  
8, 12 282:13 383:13  
**basic** 93:10

**basically** 243:21  
309:24  
**basing** 375:18  
**basis** 186:16 219:20  
227:4 279:12 281:14,  
18, 21 282:24 283:21  
284:7 285:20 423:12  
**Bates** 65:2  
**Bates-marked** 242:8  
**bathroom** 101:8, 20  
144:19 145:2  
**beating** 311:16 329:7  
**began** 24:18 70:6  
138:10 147:23  
193:16 304:5  
**beginning** 6:8 102:17  
125:3 131:15 187:21  
216:17 371:6  
**behalf** 6:17 48:11  
416:13, 18  
**behave** 115:9 228:20  
231:24  
**behaved** 114:11  
119:16 168:10  
**behavior** 209:17  
219:18, 19 220:6, 15  
222:16 223:21 224:4,  
22 227:3 321:18  
322:8 329:3, 21  
330:23  
**behavior,** 220:12  
227:11  
**behavior's** 386:17  
**believe** 15:22 26:9,  
12, 15 29:21 40:17  
88:8 100:13 103:3  
108:17 110:1 111:12  
117:9 119:8 137:8,  
19, 21 139:4 152:12  
173:15 178:13 189:1,  
4 203:7 207:8 212:7  
220:18 231:2 248:7  
250:19, 24 259:9  
260:2 264:6 267:16  
275:6 280:18 281:6  
288:23 313:10, 12  
333:9 348:19 350:2,  
12 378:17, 20, 22  
408:13 412:3 422:4  
426:5, 13

**believed** 117:15  
188:22 189:2  
**belong** 417:8  
**belongs** 268:17  
**benefit** 172:15  
**benefits** 231:23  
232:3 366:3, 5  
367:24  
**Bennett** 104:3  
114:14, 15, 22 119:11  
162:21 298:9 304:3  
408:15  
**Bennett's** 114:17  
314:22 408:16  
**BENSON** 2:21  
**best** 9:4, 4 20:6  
72:12 115:10 127:17  
282:22 284:1 309:13  
349:4 350:12 421:3  
**better** 35:21 63:17  
122:23 156:14 188:3  
230:16, 19 315:17  
348:21 419:23  
**beyond** 210:21  
418:11 420:2 427:5  
**big** 158:20, 22  
216:13 246:24  
404:16  
**bill** 119:24 120:3  
123:4, 10, 12 131:24  
415:15 416:7  
**bills** 161:22  
**bit** 182:11 290:4  
417:14  
**blabbering** 344:20  
**black** 177:11, 14  
284:21 421:14  
**blank** 127:23  
**blocked** 117:14, 15  
**Bloom** 70:17, 19  
296:12 297:2, 7, 19,  
22 298:18 304:1, 13,  
14, 24 305:12, 23  
306:5, 8 307:3  
311:24 406:20 407:3,  
12 408:2, 10  
**Bloom's** 301:4  
**blowback** 288:9, 14,  
16, 18

<p><b>board</b> 44:2, 6, 7, 9, 10, 11, 12, 19, 21 45:2, 4 60:24 61:1, 8, 9, 13 62:3, 16, 18 63:3, 12, 18, 24 64:1, 7 212:24  <b>Boards</b> 60:19 61:15, 18, 23 62:5, 10  <b>bodily</b> 155:3  <b>body</b> 106:20, 21 116:16  <b>bogus</b> 85:11 87:13 88:9  <b>bonds</b> 40:16  <b>bone</b> 284:22  <b>bookkeeper</b> 27:23  <b>bookkeeping</b> 28:9  <b>books</b> 34:4 378:16  <b>borderline</b> 233:19  <b>borders</b> 162:17  <b>boss</b> 301:16  <b>bossiness</b> 114:20 116:6  <b>bossing</b> 114:19 115:11  <b>bossy</b> 115:8, 17 116:1, 7  <b>bottom</b> 60:10 96:18 106:23 159:7 210:6 307:24 371:3 404:15  <b>bought</b> 232:20 408:24  <b>bounce</b> 426:21  <b>box</b> 360:10  <b>Brady</b> 96:22 97:9 104:5 119:12 136:20 139:7 140:13 293:12 298:16 302:19 303:14 307:3 343:10, 12, 13 354:21 361:10, 18 408:11  <b>Brady's</b> 137:15 138:14, 17 140:11 143:9 301:9 302:7 408:11  <b>brand</b> 400:3  <b>breach</b> 272:9 282:8  <b>break</b> 19:22 36:12, 13 43:9 99:7 101:8, 20 144:19 145:3, 4, 5, 6 178:2, 8 191:12, 16 273:19 315:13, 19, 22</p>	<p><b>breaking</b> 254:1 273:6, 9, 24  <b>brewing</b> 135:10  <b>brick</b> 143:14 307:13  <b>brieser@discrimlaw.net</b> 2:16  <b>brilliant</b> 115:23  <b>bring</b> 85:12 86:18, 19 89:9 101:16 166:1 171:12, 14 186:17 197:13 249:3 256:12 300:10 323:9 379:2  <b>bring-your-own-device</b> 410:19  <b>Britain</b> 186:7 287:2 289:21, 24 291:6 319:5 373:1  <b>British</b> 286:1 287:9, 10  <b>broadly</b> 180:2  <b>broke</b> 95:18 273:1, 21  <b>brought</b> 85:12 92:8, 9 93:2 96:21 100:11 171:15 197:16 247:23 258:23 261:3 307:8 344:3 348:20 418:16, 20 419:19  <b>brushed</b> 107:7  <b>building</b> 168:9 340:20, 21  <b>bullshit</b> 54:21  <b>bumble</b> 425:14  <b>bumped</b> 307:13  <b>bunch</b> 414:6 420:9  <b>bury</b> 262:7  <b>business</b> 10:19 40:20, 22 137:5 155:5 213:18, 22, 24 214:1, 19, 23 215:3, 7, 8 216:2, 21 237:13, 16, 24 238:8 259:22  <b>busyness</b> 163:2  <b>butt</b> 171:1 195:20 196:3 212:19  <b>buy</b> 409:14  <b>Bylaws</b> 3:11 51:1, 4, 8, 11, 15, 17 54:13, 14 56:13 59:9, 21 60:1</p>	<p>61:12 64:10, 13, 19 66:18 67:6 68:7  <b>Bylaws</b>, 55:14    <b>&lt; C &gt;</b>  <b>c3</b> 422:1, 6, 11, 11, 15, 16, 17 423:6, 10, 12, 14, 15, 16, 18, 20, 20 424:6, 20, 22, 24 425:6, 6, 18, 20, 23 427:17, 19  <b>c4</b> 421:24 422:10, 10, 14, 17 423:6, 10, 13, 16, 18, 19, 23 424:2, 5, 14, 17, 20 425:17, 21, 22 426:1, 6 427:16  <b>Caitriona</b> 96:22 97:9 104:5 113:21 119:12 136:20 138:14 140:13 143:9 254:17, 21 293:11 298:15 301:9, 14 302:7, 9, 14, 16, 19 303:14 307:3 361:10, 18 408:11, 11  <b>Caitriona's</b> 302:24 307:12 407:3  <b>calculate</b> 41:12  <b>calculated</b> 126:10 127:21  <b>Call</b> 18:18 41:4 42:16, 24 54:20, 22 55:1, 16, 18 57:22 58:21 80:5, 16 120:22 133:4 167:1 169:20 170:15 195:8, 8, 23 196:6, 8, 9, 12, 15 236:2, 7, 17 297:22 304:3 314:9 337:2 338:1 392:12, 20  <b>called</b> 10:12, 14 65:1, 2 67:16 68:18, 18 81:10 97:23 98:12 107:18 115:9 134:14 147:22 183:10 213:17 239:19 259:21 410:7  <b>calling</b> 56:7 57:18 81:5 154:18 183:20 326:24 392:21</p>	<p><b>calls</b> 338:20 339:3 421:1  <b>calumny</b> 341:6  <b>campaign</b> 279:21 286:3 287:3, 11, 17, 18 373:12  <b>campaigns</b> 425:9, 10, 13  <b>Canada</b> 267:8  <b>candidates</b> 423:22 425:8, 10  <b>capable</b> 18:1  <b>capacity</b> 10:2 17:1  <b>card</b> 249:23 250:2, 2, 6 251:2, 3  <b>cards</b> 249:24  <b>care</b> 7:24 102:3 208:12, 17, 24 287:3, 4, 5  <b>cared</b> 209:12 248:12  <b>career</b> 349:2  <b>careful</b> 292:2  <b>carefully</b> 185:14 432:4  <b>Caroline</b> 108:17 109:16  <b>CARSON</b> 2:3 3:5 6:10, 11 7:3 10:24 13:21 14:9, 13, 19, 23 15:5 16:19 17:4, 8, 20 18:2, 9, 15, 19 19:3, 5 20:9, 17 21:4, 17, 22, 23 22:4, 15, 16, 24 23:6, 10, 18, 22 24:4, 14 25:18 26:19 27:16 28:8, 12, 13 29:18 30:3, 8, 12, 23 31:9, 17, 22 32:5 33:17, 21 35:12, 15, 19, 22, 23 36:5, 8, 13, 21 37:8 38:3, 17 40:21 41:1, 4, 7, 11, 18 42:1, 8, 12, 15, 18, 21, 24 43:6, 8, 17 46:15, 19, 20 47:13, 22 48:2, 12, 19, 24 49:4, 9, 10, 15 50:20 51:16, 22 52:5, 13, 20, 24 53:4 54:20 55:3, 7, 11, 22 56:2, 6, 6</p>
--	---	--	---



57:3, 5, 14, 15, 20  
 58:15, 16, 21, 24 59:7,  
 14, 17 60:8 61:7  
 62:4 65:14, 17, 18, 23  
 66:9, 23 67:4, 12, 14  
 68:3 71:4, 17 72:7, 9,  
 19, 21 73:3, 19 74:14,  
 18, 19 75:5 76:2, 10,  
 19 77:4 78:2, 8, 14  
 79:11 80:19 81:4, 12  
 82:5, 9, 13, 19, 23  
 83:2, 23 84:4, 11, 14,  
 17 86:14 87:3 88:3  
 89:14, 21 90:10  
 91:12 92:18 94:10  
 95:13 97:4 99:12  
 100:7, 21 101:5, 18,  
 22 102:1, 14 103:7  
 105:13 106:14 107:6  
 108:10, 23 109:16  
 111:24 112:6, 12, 18  
 113:6, 7 115:19  
 116:13 119:2 121:5,  
 12, 16, 20 122:1, 3, 6  
 123:24 125:13  
 128:12 130:3 131:2,  
 17 132:24 133:19  
 134:4, 19 135:17  
 137:11, 23 139:15  
 140:18 141:12 144:9,  
 18, 24 145:7, 20  
 146:5, 9, 18, 23 147:4,  
 17 148:6 149:9, 14,  
 23 150:5 151:5, 16,  
 20 153:12, 19 154:2,  
 11, 19, 21 155:19  
 156:1, 8, 13 157:2, 11  
 158:1, 24 159:12, 15  
 160:3, 9, 12, 19 161:9,  
 14, 23 162:6, 7, 12  
 164:7 165:2, 12, 23  
 166:5, 17, 21, 24  
 167:4, 12, 17, 23  
 168:4, 20 170:8  
 172:10 173:19  
 175:13, 16, 21 177:12  
 178:11, 17, 21 179:24  
 181:4 182:6, 10  
 184:3, 11 185:5, 15,  
 22 187:5 188:14

190:20 191:13, 18  
 192:8 194:15, 20  
 195:1, 5, 13, 18, 24  
 196:6, 11, 13, 16, 20  
 197:4, 15 200:18, 20  
 202:6, 12 203:3  
 205:16, 22 206:12  
 207:11, 17, 23 208:16,  
 23 209:20 210:12, 16,  
 17 212:2 213:1, 2  
 214:15, 22 215:2, 9,  
 16 217:9 218:24  
 220:8 221:15, 20  
 222:1, 8 223:7, 12, 19  
 224:12, 20 226:5, 9,  
 14, 21 229:9 230:18  
 231:10 233:17  
 234:16, 24 235:8, 20  
 236:12, 16, 21 237:15,  
 22, 23 238:6 239:2,  
 18 240:4, 20 241:3,  
 18 242:9, 13 244:15  
 245:1, 4 246:5, 11, 16,  
 22, 24 247:5 248:9  
 250:16 253:6 255:12,  
 22 256:7 257:10, 18  
 258:2 259:1, 19  
 260:14 261:5 262:23  
 263:3, 20, 23 265:12,  
 19 266:1, 14 267:12  
 269:10 270:1, 3, 8, 17,  
 21 271:2, 13, 24  
 272:6, 20 273:7, 13  
 274:22 275:11, 23  
 276:5, 14, 22 277:17,  
 21 278:4, 15, 18  
 279:2, 11 280:1, 12  
 281:18 282:3, 11, 21  
 283:7 284:3, 4, 13  
 285:8 287:6 288:6  
 290:3, 5, 21 291:10,  
 19, 24 294:1, 11, 16  
 295:8, 16, 21 296:3, 5,  
 11, 23 297:6, 11  
 298:11 299:3, 10, 19  
 300:14, 16 301:21  
 302:6 303:9, 21  
 305:17 306:3 308:5  
 310:6, 23 311:14  
 314:21 315:15, 20, 23

316:16 317:11 319:6,  
 19 322:4, 16, 21  
 323:3, 12, 20 324:1, 4,  
 13 325:7, 12, 15, 19  
 326:2, 6, 11, 16 327:4,  
 11, 21 328:19 329:10,  
 18 330:3, 8, 14, 20  
 331:4, 11, 16 332:9,  
 19 333:21 334:3, 12  
 335:11, 18, 23 338:5  
 339:1 340:24 341:21  
 342:8, 22 344:4, 9  
 345:1, 9, 12, 13  
 346:21 348:4, 12  
 351:18, 24 352:2  
 353:4, 7, 18, 21 354:3  
 356:5, 11 357:17  
 358:2, 7, 17, 21 359:1,  
 5, 9, 17 360:3, 16  
 361:4, 8 362:22  
 364:11, 15 365:6, 9,  
 13, 15 367:1, 7 368:6  
 369:10, 16, 23 371:24  
 372:16 373:22 374:1,  
 17 376:19 378:11  
 381:2, 7, 11, 17, 20, 24  
 382:3, 11, 13, 21  
 383:1, 22, 24 384:14,  
 18 385:6, 23 386:8,  
 13, 18, 22, 24 387:6,  
 11, 16, 19 388:6  
 390:5 391:3, 4, 16, 22  
 392:1, 11, 19 393:6,  
 14, 24 394:4, 10, 11,  
 16, 20 395:2, 7, 18  
 396:2, 6, 10, 18, 20  
 397:5, 12 398:14, 19,  
 23 399:8, 18, 22  
 401:7, 13, 22 402:7, 9,  
 15, 23 403:1, 5, 11  
 404:3, 5, 14, 24 405:7,  
 18, 22 406:23 410:15  
 411:9, 17 413:14  
 414:7 415:11, 15, 19,  
 24 416:7, 12, 16, 21  
 417:1 421:18 422:22  
 423:4 426:11, 20  
 427:3, 14  
**Carson**, 95:18

**case** 17:13 36:19  
 41:14, 19 43:4 53:16,  
 19 54:1, 4 58:4 65:5,  
 20 70:11 73:7 80:21  
 81:21, 24 85:11, 12,  
 21 98:11 102:20  
 109:10, 23 110:5  
 118:4 128:8, 15  
 135:19 137:20 143:2  
 151:19 153:14 154:7,  
 13 159:2 165:8  
 168:9, 15, 20 169:8  
 179:21 188:20 189:9  
 195:19 215:22  
 238:14 240:3 260:6  
 261:2, 7, 9 262:12  
 265:11, 13, 16 269:23  
 270:11, 13, 13 271:4,  
 23 298:8 312:3, 5, 24  
 313:3 338:9 340:20,  
 22 371:1 386:7  
 387:15 398:12  
**cases** 32:24 98:24  
 99:14 100:10 109:10  
 119:9 239:20 262:16  
 298:7 312:1  
**cash** 413:1  
**catch** 250:14  
**categories** 367:15  
**categorization** 151:12  
 207:10 255:11  
 269:15  
**category** 72:14  
**cause** 129:18 134:18  
 351:1  
**caused** 101:16  
**causes** 329:17  
**CAVALIER** 2:8  
 6:12, 12 10:21 13:17  
 14:3, 12, 14, 18 16:16  
 17:2, 5, 17 18:6, 13,  
 18, 20 20:4, 16, 22  
 21:19 22:12, 20 23:3,  
 7, 14, 20 24:12 26:17  
 28:7, 10 29:16 30:18  
 31:4, 15, 20 32:4  
 33:14, 20 35:10, 14,  
 17 36:6, 11, 18 37:23  
 38:15 40:19, 23 41:3,  
 6, 9, 21 42:4, 19, 23

43:5, 7 46:13, 17, 22  
 47:15, 18, 24 48:4, 10,  
 17, 21 49:2, 5, 12  
 51:14 52:8, 18, 21  
 55:1, 4, 10, 18, 23  
 58:13 59:3, 12, 15  
 60:3, 7 61:3, 24 65:9,  
 16, 22 66:8, 20 67:3,  
 7, 24 71:2, 15 72:6,  
 24 73:14 74:11, 16  
 75:1 76:8, 13, 23  
 78:1, 6, 12 79:4  
 80:17 81:2 82:4, 6,  
 11, 15 83:22 84:8, 13  
 86:7 87:24 89:12, 19  
 90:9 91:22 93:7  
 100:5 101:17, 21, 23  
 103:1 105:11 107:4  
 108:13 111:16 112:9  
 113:2 116:12 123:21  
 125:6 128:9 129:24  
 130:21 131:5 132:19  
 133:13 134:2 137:2  
 140:16 141:4 144:7  
 145:3, 10 146:1, 7, 15,  
 21 147:2, 15 148:5  
 149:7, 16 150:3  
 151:2, 11 152:7  
 153:15, 23 154:9, 17  
 155:18, 24 156:5, 12  
 157:16 158:9 161:5,  
 12, 20 162:1 164:23  
 165:9, 19 166:4, 15,  
 18, 23 167:10, 15, 20  
 170:6 171:5 177:1  
 178:9, 13 179:22  
 181:2, 21 184:9  
 185:10, 19 186:1  
 191:11, 15, 21 194:14,  
 16, 23 195:3, 7, 22  
 196:4, 8, 12, 15, 18  
 197:1 200:16 202:9,  
 24 205:19 206:6  
 207:9, 20 208:14, 19  
 209:10 210:9, 14  
 212:23 214:4, 20, 24  
 215:4, 14 217:5  
 218:23 220:7 221:7,  
 18, 23 222:3 223:3, 9,  
 17 224:15 226:7, 13,

19 228:10 229:4  
 230:17 231:3 233:21  
 234:21 235:4, 11  
 236:6, 19 237:7, 19  
 238:3, 23 240:15, 24  
 241:17 244:5, 11, 23  
 246:2, 12, 19, 23  
 247:2 248:2 253:5  
 255:10, 18 256:5  
 257:8, 16 258:12  
 259:14 260:7 262:22  
 263:1, 16, 17, 19  
 265:9, 15, 22 266:13  
 268:23 269:14, 22  
 270:7, 14, 19, 22  
 271:5, 8, 19 272:3, 8,  
 22 273:4, 10 275:10  
 276:2, 19 277:20  
 278:2, 11 279:9, 24  
 280:8 281:16, 20  
 282:7 283:2, 23  
 284:10 285:5, 7  
 286:24 287:21  
 290:19 291:22  
 293:23 294:9, 15  
 295:6, 12, 19 296:1, 4,  
 22 297:4, 9 298:5, 24  
 299:8 301:19, 24  
 303:6, 18 304:21  
 306:1 307:21 310:4  
 311:11 314:20  
 315:12, 17 317:10  
 319:2, 12 322:13, 20,  
 24 323:18, 23 324:2,  
 7 325:10, 14, 17  
 326:4, 8, 15, 23 327:9  
 329:6, 16, 23 330:12,  
 15 331:2, 6, 13  
 332:16 333:20 334:1,  
 10, 19 335:16, 21  
 337:16 342:5 344:7,  
 22 345:4, 10 346:17  
 347:24 348:11  
 351:22 353:6, 11  
 354:2 355:24 357:15,  
 21 358:6, 9, 15 359:4,  
 7 360:1, 15, 24  
 362:21 364:10, 14  
 366:23 367:4, 13  
 369:8, 14, 20 371:23

372:15 373:18  
 374:14 378:8 381:1,  
 5, 9, 13, 18, 22 382:2,  
 9, 19 383:14, 19  
 384:13, 17, 20 386:5,  
 11 391:1, 6, 10, 20, 23  
 392:7, 10, 13 393:2, 9,  
 16 394:6, 14, 18, 22  
 395:5, 12, 16, 24  
 396:4, 9, 14, 22 397:3  
 398:13, 22 399:2, 16,  
 20 401:9, 18 402:5, 8,  
 10, 18 403:3, 9, 18, 22  
 404:11, 21 405:2, 11,  
 20 406:21 411:8  
 413:13 415:17, 22  
 416:10 422:21 423:3  
 426:9, 18 427:1, 4  
 429:18  
**cc'd** 189:18 264:8, 9  
 421:2  
**censor** 357:6 358:24  
**censoring** 357:8  
**centered** 422:6  
**century** 50:23  
**CEO** 29:5, 10, 12  
 30:4, 6, 24 32:20  
 33:3 46:10, 12, 16, 21  
 47:14 49:1, 11, 22, 23  
**certain** 93:4, 5, 9  
 143:15 191:5 217:20  
 252:21 253:3, 8, 17  
 309:6 312:10  
**certainly** 129:17  
 199:22 217:24  
 239:22 265:23  
**certification** 5:3  
**certify** 431:2 434:3  
**cetera** 173:24, 24  
 417:18  
**chair** 81:19 233:12  
**chairman** 37:11  
 45:16 67:20, 20  
 69:11, 13, 18  
**chambers** 56:5  
**chance** 10:6 131:1  
 418:7 419:6, 21  
**change** 341:13 433:3,  
 6, 9, 12, 15, 18, 21, 24

**changed** 96:18 159:7  
 206:16 257:1 333:12  
**changes** 258:20  
 336:6 341:4 342:2, 6,  
 10, 13 432:11 434:7  
**changing** 333:9  
**chaperones** 216:9  
**chapter** 202:1  
**character** 349:6  
**characterization**  
 23:11 134:3 140:17  
 268:24 281:17  
**characterize** 135:14  
 138:21 217:22 311:1  
**charge** 81:19 109:4,  
 20, 23 154:15 327:16,  
 23 328:6  
**charges** 97:16  
**charter** 50:14  
**check** 16:2, 13 19:1  
 29:8, 9 68:2, 4, 5, 6, 8,  
 10, 12, 15 97:17, 19  
 122:19 123:23 124:4  
 125:24 296:14  
 396:11 411:7  
**checked** 34:13 39:14,  
 18  
**checking** 378:10  
**checks** 379:9, 10  
**child** 308:20  
**children** 289:21, 24  
 291:7, 14, 17 319:4, 18  
**chilling** 248:15  
**choice** 42:22 72:3, 10  
 167:4 345:1 349:12  
 409:14  
**choose** 330:4  
**chorus** 158:20  
**chose** 33:6 34:11  
 164:15  
**circles** 374:8  
**Circuit** 43:12  
**circumstance** 174:19  
**circumstances** 75:18  
 219:8, 11  
**cite** 118:20  
**CIVIL** 1:1 98:13  
 272:11 273:12, 15  
**claim** 41:17, 19  
 108:18 160:7 201:4

203:18 261:18, 20, 20  
282:9  
**claimed** 97:10 160:2  
**claims** 97:14, 15  
165:7 230:19 282:12  
**classification** 10:20  
**clean** 119:23 120:3  
123:4, 9, 12 131:24  
**clear** 8:5 22:1 23:12  
32:11 41:15 61:3  
63:21 95:21 101:1  
172:17 187:24 207:2,  
3 216:17 220:2  
223:15, 17 233:11  
247:16 256:15, 20  
257:5 271:19 284:5  
354:5 356:16 360:8,  
18 361:4 362:1  
395:6, 8  
**clearly** 58:10 83:14  
96:13 174:17 204:7  
391:23  
**client** 30:14 31:18  
36:14, 22 43:15  
48:15, 15 55:16 57:5  
59:10 154:4 223:13  
226:6 261:6 315:24  
323:20 330:21 344:5,  
12 357:21 386:12  
387:5 415:16  
**clients** 291:18  
**client's** 134:4 195:20  
207:11 315:16 330:8  
**clock** 52:10, 14 54:23  
55:9 56:20 57:8  
58:8  
**close** 74:12 93:12, 15  
96:10, 16 106:19  
107:14 155:1 159:5  
172:21 180:3, 9, 12,  
22 181:6, 12 192:18  
198:17 199:17 204:6,  
7, 16, 18 206:9 217:7  
**closed** 217:20 241:21,  
22 262:16  
**closely** 35:2, 5, 7, 9  
94:7 272:1 333:1  
424:16, 17  
**closer** 270:21  
**closes** 313:8  
**Code** 5:15  
**colleague** 375:1  
**colleagues** 9:17 116:2  
**collect** 124:17 313:1  
**collected** 124:16  
209:13  
**college** 308:16  
**come** 9:15 60:6  
83:17, 18 94:24 99:5  
116:23 117:5, 7, 11  
118:24 135:5, 8, 12,  
21 139:6, 6, 7, 7  
141:6 144:1, 2, 3  
145:8 150:14 159:9,  
11 160:8, 9 162:20  
163:20, 22, 23 164:6,  
9 166:13 168:3  
169:8 171:16 172:6  
173:13 181:23 182:2,  
12, 24 183:3 184:9  
185:13 214:17 216:1,  
17, 18, 19, 20 237:12  
239:7 244:22 250:3,  
5 251:12, 21 255:9,  
19, 24 256:18 257:7  
259:8, 9, 18 263:5, 8  
305:12 309:15 340:8  
397:6 411:6 413:4  
414:1 428:18, 23  
**comes** 36:14 63:23  
149:24 159:6 216:12  
221:6, 6 298:3 341:6  
346:3 418:23  
**comfortable** 238:21  
306:22, 24 362:17  
**coming** 18:14 28:20  
57:10 96:20 117:9,  
14, 15 191:12 247:13,  
19 252:1 313:4  
366:21  
**command** 246:17  
335:10  
**commencing** 1:14  
**comment** 228:16  
**comments** 124:8, 12  
154:23 155:22, 22  
308:10  
**commission** 434:16  
**commit** 184:2  
**committee** 37:12  
63:23  
**Commonwealth** 1:17  
**communication** 143:5  
245:9 348:2  
**communications**  
204:13 368:20  
397:10 413:11  
**companies** 33:7 34:12  
**company** 27:15, 21,  
24 28:2, 9, 17 33:6, 7,  
10 34:4 40:5, 7  
**compare** 54:18 367:8  
**Compared** 220:14  
**comparing** 215:10, 17  
**compensate** 26:24  
**compensated** 24:15, 18  
**complain** 107:16  
115:20 118:14  
119:16 129:9 148:8,  
9 185:13 198:5  
216:1 236:1, 12  
237:11 297:24  
322:23 350:19 351:4,  
8, 10, 20 352:3  
**complainants** 129:2  
380:3, 3  
**complained** 108:7  
113:22 114:2, 13  
115:12, 17, 18, 21, 22,  
22 147:5 150:15  
152:20 157:14 158:5  
235:18, 22 238:19  
403:15 418:17, 20  
**complaining** 115:23  
130:20 132:11 147:9,  
14 156:20 320:17, 19  
321:20 349:13  
354:10 362:12 369:6,  
12 403:10  
**complains** 214:2  
353:24  
**complaint** 81:23  
82:24 83:6, 11 84:22  
85:9 86:3, 5, 13, 16,  
17 87:18, 21 88:15,  
19 91:19 92:10 97:2  
116:3, 3 117:2  
120:13 129:11  
132:13, 14, 15, 22  
148:11, 15, 22 150:18  
159:6 187:18 193:20  
199:19, 20 204:21  
211:11 224:24 293:7,  
10, 11 321:11, 22  
322:6 323:4, 6 324:3  
349:18 350:4 351:11,  
21 352:5, 8 353:9  
354:13, 17, 23 357:11  
**complaints** 88:24  
94:1, 2, 4, 6, 17, 19, 20  
95:13 96:23 97:11,  
15 99:16 105:15  
107:22, 24 108:1, 21  
109:1, 11 110:9, 14  
114:10, 15, 17 116:21  
120:6, 14 129:17  
131:9, 14, 18, 19, 20,  
21 132:2, 3, 5 153:21  
156:23 171:10  
182:20 184:13, 14  
185:16 187:17  
188:24 198:22  
200:23 201:23  
222:21 225:7, 8  
229:12 231:12 234:4  
239:5 256:13 259:4,  
5 292:19 293:7  
341:10 352:16, 17  
354:16, 24 367:14, 15,  
16, 17, 20 368:8  
374:16 380:2, 2  
384:24  
**complete** 221:24  
222:5 234:3 261:2  
382:14 384:1  
**completed** 380:14, 16  
383:4  
**completely** 15:19  
22:23 56:11 332:13  
336:18 407:9  
**complex** 21:1 308:11  
337:24 339:7  
**compliance** 23:15  
**complicated** 18:23  
283:18 429:7  
**complicates** 181:9  
**complication** 372:8  
**complications** 12:16  
14:8, 10 15:6 93:19

<b>complicit</b> 163:12 164:3, 5, 15 169:13, 22 181:19 190:14, 19, 22 <b>component</b> 211:21 <b>comprehensive</b> 380:15, 16 382:14 383:13 404:7 <b>computer</b> 35:17, 21 <b>computer-aided</b> 431:7 <b>computer's</b> 35:19 <b>concern</b> 148:14, 14 149:19 152:18, 18 210:8 217:16 220:13, 16, 16 222:17 298:6 305:13, 13 <b>concerned</b> 77:19 79:18 117:9 129:2 150:22 186:4, 21 216:12 217:14 227:13 248:15 298:12 304:11 313:9 322:10 329:2, 4, 19, 22 330:24 331:12, 18 371:13 <b>concerning</b> 121:19 150:11 257:1 332:22 334:5 <b>concerns</b> 77:17 219:18, 22 227:12 255:1 406:17 408:5 <b>concluded</b> 315:8, 9 370:23 430:1 <b>concluding</b> 307:14 <b>conclusion</b> 91:1 92:23, 23 154:18 202:20 315:7 326:24 383:12 <b>conclusions</b> 281:22 <b>concoct</b> 108:16, 18 <b>concocted</b> 83:1, 3 85:8 86:6, 16 87:21 88:15, 19 95:22 109:11 172:15 173:2, 3 229:22 350:7, 8 <b>concoction</b> 85:16, 18, 21 <b>condition</b> 6:14 409:21 <b>conditions</b> 6:18 89:22 93:4, 6, 10	214:6 252:1, 2 320:3, 9, 17 366:19 <b>conduct</b> 79:3, 9, 9, 13, 14 92:21 101:15 106:3 107:2 155:21, 22 179:9, 11, 19 180:19 183:12 219:12, 12 303:2 369:6 380:17 382:15 <b>conducted</b> 144:11 <b>conference</b> 57:2 345:22 346:15 421:1 <b>confidant</b> 142:5, 7 <b>confidence</b> 285:1 <b>confident</b> 423:24 <b>confidential</b> 128:14 381:9, 12 <b>confidentiality</b> 127:7, 10, 14, 15 128:11 <b>confines</b> 420:2 <b>confirm</b> 59:20 263:5 377:23 <b>confirmed</b> 191:4 274:15 <b>confirming</b> 254:2 263:13 264:10 <b>confirms</b> 58:5 253:24 <b>confront</b> 406:13 <b>confronted</b> 177:9 346:6 <b>confusing</b> 273:11 <b>congratulate</b> 299:12 300:9 <b>Congratulations</b> 97:8 <b>Congress</b> 159:13, 14 <b>conjunction</b> 186:15 <b>connected</b> 16:24 17:3 20:13 362:4 368:9 373:12 424:22, 23 <b>connection</b> 56:7 65:4 149:5 152:6 162:9 312:16 362:19, 23 <b>connived</b> 289:23 291:16 <b>consensual</b> 215:10, 11 <b>consequences</b> 288:13, 18, 20, 21, 24 371:14 374:6, 11 <b>consequences,</b> 189:23	<b>consider</b> 12:8, 13 14:2 109:3, 3 182:21 185:9 235:3 236:18, 24 248:16 314:6 332:24 334:8, 13, 16 335:24 338:14, 16 342:2 <b>considered</b> 236:23 334:7, 14 335:22 <b>considering</b> 12:19 13:23 16:5 338:13 424:21 426:2, 7 <b>considers</b> 340:7 <b>consist</b> 60:21 <b>consistent</b> 234:5 <b>consolidated</b> 187:22 <b>conspiracy</b> 259:21 272:12 350:6, 7, 8 <b>conspiring</b> 370:6 <b>constant</b> 183:21 <b>contact</b> 34:18 130:8, 16 157:20 268:2, 17 269:12 297:24 339:4, 5 367:18 <b>contacted</b> 152:16 266:7, 11 267:20 276:1, 7 <b>contacts</b> 268:11, 12, 14, 15, 22 <b>cont'd</b> 4:1 <b>contemporaneous</b> 390:18 <b>content</b> 130:18, 19 134:12 153:3, 5, 6 157:22 158:5, 16 172:19 187:12 211:8 218:5 219:7 239:15 368:21 <b>contented</b> 153:7 <b>contention</b> 342:23 <b>contentment</b> 153:11 185:3 <b>context</b> 74:7, 21 130:23 156:24 183:20 210:23 259:10 351:23 352:1 358:10 <b>Continue</b> 77:8 231:24 241:11 262:9 324:14, 22 326:17	347:20 348:15, 18 359:18 364:21 365:18 396:12 <b>continued</b> 89:23 289:13, 15, 16 320:15, 18 321:18 322:7 329:3, 20 330:22 338:6 347:7 361:19 <b>continues</b> 338:6 339:10, 10 366:2 <b>continuing</b> 262:10 <b>continuously</b> 311:4 <b>contradict</b> 204:1 <b>contradiction</b> 204:14, 22 205:5, 6 404:10 <b>contradictions</b> 204:4 313:6 <b>contradictory</b> 143:15 307:14 310:17 312:1 <b>contrary</b> 309:8 <b>contribution</b> 414:16 <b>control</b> 56:23 112:10 344:5, 13 386:16 <b>controversial</b> 59:16 <b>convenience</b> 337:19 <b>conversation</b> 30:14 31:18 96:7 101:6 135:24 193:14 277:18 304:4 315:10, 24 407:22, 23 <b>conversations</b> 125:1, 4, 5 245:17 <b>convinced</b> 96:24 <b>convulses</b> 97:6 <b>COO</b> 33:5 <b>cooperate</b> 332:14 <b>copied</b> 190:2 <b>copying</b> 419:11 <b>core</b> 87:12 <b>corner</b> 349:11 <b>corporate</b> 45:7 47:21 49:20 50:7, 24 62:21 69:1, 6, 12, 16 155:13, 20 <b>correct</b> 11:2 13:24 44:8 64:10, 19 67:6, 16 68:22, 23 75:8, 9 80:6 81:6 82:3, 10 90:4, 8 91:21 99:21 123:5 124:2 131:22
--	---	---	--



<p>138:23 140:14 142:8 143:10 150:2, 9 153:22 155:14 156:3 158:3 160:18 163:9 165:15 176:14, 15 183:13 187:10 189:2, 23, 24 190:3, 4 198:24 202:8 207:7, 19 208:1 213:10 218:16, 17, 19 219:16 229:24 231:14 232:21, 22 235:10 237:18 240:11 241:16 243:3 244:1, 2 251:22, 23 252:11 253:3, 8 255:14 276:1, 7 285:4 288:10, 22 289:3, 14 292:15, 20, 21, 23 293:22 294:8 295:18 297:15 298:4, 23 301:10 305:20, 21, 23 306:6 307:4 316:22 317:9 320:5, 21 321:7, 12 328:10 329:5 337:3, 4, 15 340:19 341:16 344:8 347:11 349:14 350:20 351:5 354:10, 16 356:17 357:11 363:21, 22, 24 364:1, 6, 7, 9, 13, 23 365:22 366:3, 22 368:10 369:7, 13, 13, 15, 18 371:6, 7 375:3 376:21 377:3 378:7 380:7 385:8, 9 399:1 407:18, 19 409:1 410:16 411:19 412:14 419:9, 10, 13 420:10 421:13 422:19 425:24 426:3 427:2, 3, 20 431:8 434:5 <b>corrected</b> 84:11 <b>correcting</b> 112:21 <b>corrections</b> 432:5, 7 434:7 <b>correctly</b> 313:13</p>	<p>410:20 431:6 <b>correspondence</b> 421:2 <b>corroborate</b> 206:24 210:1 241:12 <b>corroborated</b> 208:3 <b>corroborating</b> 241:10 <b>couch</b> 96:10, 17 106:18 107:15 192:18 198:18 199:18 204:9 <b>could've</b> 135:21 141:6 163:20 182:24 183:2 208:9 210:24 304:20 378:9 379:20 428:18 <b>counsel</b> 5:2, 19 6:9 53:22 54:5, 7 58:13 121:8, 22 142:8 242:5 244:20 245:10 262:2 323:15 431:9 <b>Counselor</b> 365:14 <b>Counsels</b> 55:24 315:22 365:3 429:21 <b>counsel's</b> 56:16 <b>count</b> 56:20 57:7 58:7 298:13 428:14 <b>counted</b> 291:20 301:3 <b>counterclaim</b> 261:19 265:13 270:12, 15, 18 271:3, 4, 12, 16, 18, 24 272:2, 7, 8 279:13 281:15, 17, 21 282:5, 10 283:10, 11, 12, 14, 16, 21 284:6, 8, 21 285:2 373:24 416:1, 2 <b>counterclaims</b> 269:22 271:21, 23 272:18 282:24 <b>counting</b> 293:3 <b>counts</b> 204:1 <b>couple</b> 9:17 124:7 323:2 <b>course</b> 58:16 75:20 142:20 151:16 159:3, 3 171:2, 13 176:20 197:20 200:3 212:17 239:11 268:18 338:16 341:15</p>	<p>361:22 401:11, 13 411:23 <b>COURT</b> 1:1 5:14, 16, 18, 19, 21, 23 6:3, 16 8:23 14:14, 16 15:2 22:5, 9, 14, 18 23:15, 24 27:11 30:1 47:3, 6, 11 48:6, 8 79:6 81:8 82:21 87:1 90:19 91:6 99:9, 16 102:12 106:10 108:5 111:17 115:14 118:17 137:13 139:12 144:14 146:3 149:13 157:6 168:3 175:15, 19 197:7 201:17, 19 205:12 207:21 209:7 221:4, 9 244:6, 9 250:14, 17 278:17, 23 290:4 296:8 300:12 310:14 316:5 325:18 326:1, 6, 13 328:17 345:7 353:15, 19 359:11 376:14 399:15 414:5 429:16 432:18 <b>courtesy</b> 336:8 <b>courtroom</b> 233:11 <b>court's</b> 23:11 <b>cover</b> 290:17 <b>COZEN</b> 2:6, 21 6:12 <b>crazy</b> 8:24 395:10 <b>create</b> 8:5 9:18 299:4 <b>created</b> 9:17 10:4, 6, 10, 12 417:15 <b>creative</b> 422:4 <b>credence</b> 110:22 <b>credibility</b> 171:20 182:14 186:22 277:8 <b>credible</b> 188:1, 6, 12, 13, 13, 17, 18, 20 206:16 277:4 306:13 <b>credit</b> 410:5, 7 <b>criminal</b> 273:12, 15 <b>crisis</b> 117:6 119:18 <b>critical</b> 87:12, 12 92:3 124:8 <b>criticisms</b> 124:15</p>	<p><b>crossed</b> 286:9 <b>crosses</b> 228:17 <b>cross-talk</b> 21:13 25:15 29:14, 23 30:10 32:2 42:6 47:1, 9 51:20 52:16 53:2 65:12 67:10 72:17 82:17 100:17 101:3 121:3 152:10 158:11 159:22 167:8 168:1 173:11 188:10 190:16 194:18 195:16 205:10 207:14 209:5 211:18 214:10 221:2, 11 233:15 235:16 236:10 239:13 257:24 260:10 267:10 269:20 270:24 274:20 277:13 282:1, 19 288:1 291:2 299:16 302:4 305:2, 8 316:3 322:2 324:11 325:5 327:18 331:9 332:7 335:6 338:23 341:19 343:22 351:16 353:2, 13 356:8 357:24 358:13 365:11 382:7 383:17 384:22 386:3, 20 390:3 391:8, 13 392:5, 15, 24 393:22 394:2, 24 395:14 397:1 399:6, 13 401:16 403:20 404:1, 19 411:13 421:16 426:15 <b>crowded</b> 96:16 <b>crucial</b> 84:24 <b>cunt</b> 277:4 <b>current</b> 68:8 108:12 185:7 304:5 420:5 <b>curtailed</b> 356:3 <b>custody</b> 112:10 <b>cut</b> 393:5, 18 <b>cuts</b> 396:23 <b>cutting</b> 194:20  &lt; D &gt;</p>
---	---	--	---

<p><b>D.C</b> 345:22 346:8, 15  <b>D.C.</b> 71:14  <b>D0000017</b> 252:19  <b>D000024</b> 318:22  <b>D000037</b> 353:10  <b>da</b> 191:6, 6, 6, 6  194:5, 5, 5, 5, 5  <b>dad</b> 301:16, 23 302:7  <b>Daily</b> 162:5  <b>damage</b> 338:11  <b>damages</b> 40:22 41:8,  10, 12, 17, 20, 24 42:3,  9  <b>damaging</b> 354:7  <b>damn</b> 172:21  <b>Dan</b> 18:7 87:24  <b>dangers</b> 238:13  <b>DANIEL</b> 1:11 3:3  5:11 6:6, 21 7:6 9:9  10:22 14:18 18:20  20:5, 16, 22 22:21  23:4, 9 29:16 31:5  40:23 41:9 45:21  46:17, 22 47:15, 24  48:4 49:12 65:9  86:8 154:3 178:15  191:22 194:16 195:9  197:2 205:20 224:15  237:21 238:4 246:13  250:17 252:24  254:24 258:13 265:9  271:6 272:13 291:22  295:13 299:1 302:1  320:13 327:1 331:14  332:16 336:21 346:6  347:4 363:3 379:24  391:6 396:23 403:18  404:12 405:11 428:5  <b>Daniel,</b> 255:3  <b>Danny</b> 275:1, 2  277:22 278:13 279:6,  19 280:13, 14, 23  389:10, 11  <b>date</b> 5:9 10:5 34:9  102:22 143:11  168:10 230:1 285:7  286:15 292:9 333:16  383:5, 10 432:9  434:11</p>	<p><b>dated</b> 141:20 241:20  251:19 261:6 292:4  321:4 347:3 361:22  379:24 414:22  <b>dates</b> 50:22 169:2  286:13  <b>day</b> 18:12 31:21  43:13 48:9 179:2  190:11 192:23 193:1,  19 199:15, 22 200:10  207:4 277:7 308:20  313:23 314:9 349:3  350:4 359:16 395:10  398:2 400:1, 7, 19, 19  403:8 407:20 428:14  431:11 434:14  <b>days</b> 94:4 230:6, 8  304:7 323:2 349:17  432:15  <b>day-to-day</b> 320:23  <b>deadlines</b> 339:14  417:13  <b>deal</b> 32:19 42:24  50:20, 21 54:7 71:23  72:8 77:17 113:6  128:19 134:9 149:21  152:22 162:12  171:22 185:1 187:1  201:22 213:21  214:14 222:10, 11  228:16 246:24  268:13 312:12  320:10 359:11 376:8  378:16 410:6 411:16  412:8 428:24  <b>dealing</b> 56:13 136:13  150:21 152:12  161:17 187:3 392:9  <b>dealt</b> 95:11, 11  125:15 128:23, 24, 24  134:10 136:14  149:21 150:15 153:9  177:10 184:22  187:10, 11 213:9  214:8 217:18 225:9,  10 228:11 238:17  278:7 367:17, 20, 22  428:23  <b>Dear</b> 346:2</p>	<p><b>deceit</b> 219:19 220:5,  14 222:20 223:21  224:3, 21 227:2  228:9 321:24  <b>deceitful</b> 225:6  321:18 322:8, 11  329:3, 20 330:23  <b>decide</b> 72:13 169:24  220:9 244:18 245:1  <b>decided</b> 28:17 33:5  34:13 37:11 92:19  99:8, 9 157:23 164:4  168:10, 20 220:3  263:12 282:4 314:6  323:20 335:2 376:13,  17 393:11  <b>decides</b> 154:14  223:13  <b>decision</b> 32:24 37:13  54:12 84:19 85:10  86:18, 20 91:15, 16,  20 132:23 215:11, 20  328:7, 13  <b>decisions</b> 29:6, 7  33:1 54:11 245:13,  16  <b>declaration</b> 398:15  <b>decrease</b> 414:11  <b>deem</b> 186:14  <b>deemed</b> 432:17  <b>de-emphasize</b> 248:11  <b>deep</b> 119:23  <b>Defendant</b> 2:11, 16,  21 41:18 98:11  386:6 387:14, 16  <b>Defendants</b> 1:6 97:7  <b>defense</b> 58:13 126:8  <b>define</b> 336:11  <b>definitely</b> 112:12  132:4, 6 167:1  187:24 256:11, 22, 23  301:4 339:9 417:17,  17  <b>definition</b> 17:10  423:1  <b>definitions</b> 330:16  <b>Delaney</b> 96:22 97:10  104:7 113:20 119:12  254:17, 21 298:15</p>	<p>303:13 428:12  <b>delve</b> 216:22  <b>demand</b> 95:14 222:4  380:10 402:21  <b>demanded</b> 95:19  <b>demanding</b> 105:19  <b>den</b> 77:9, 22 133:15,  24 186:20 216:10, 11  <b>denial</b> 139:4  <b>denied</b> 95:9 96:12  97:2 138:2 139:1, 2  177:22  <b>denies</b> 310:2 311:10  <b>denounces</b> 126:5  <b>denying</b> 407:24  <b>dep</b> 81:14  <b>depends</b> 74:3 75:18  317:18, 19  <b>deponent</b> 431:5, 6  434:1  <b>deponent's</b> 387:5  <b>deposed</b> 308:20  357:21  <b>deposing</b> 432:14  <b>deposition</b> 1:11 5:11,  24 7:5, 8, 8, 16 18:12  22:19 23:1 43:3  48:14, 16, 17 56:7, 22  59:3 86:2 207:4, 12  226:3 271:18 313:23  332:11, 14 344:18  359:19 389:8 396:13  415:21 430:1 431:8  432:4, 12, 15, 17  <b>depositions</b> 30:15  31:19 36:16 97:3  <b>depreciation</b> 410:8  <b>DEPUTY</b> 56:4, 24  57:4, 14, 16 58:17, 23  343:16, 20 345:15  375:10  <b>DEREK</b> 2:1 108:15  109:7, 12, 15, 18  110:8, 11 147:7  158:23 340:22  <b>derivative</b> 422:11, 14  423:13 426:2, 8, 10  427:16, 16</p>
---	--	--	--

<b>describe</b> 107:1 192:21 196:23 344:23 <b>described</b> 79:15 154:6 <b>describes</b> 193:11 <b>describing</b> 130:14 207:11 <b>DESCRIPTION</b> 3:10 4:3 66:21 151:13 207:10 241:9 332:21 336:10 <b>designed</b> 58:10 <b>despite</b> 340:6 348:24 <b>destroy</b> 145:22 146:14, 20 428:4 <b>detail</b> 73:16 154:6 202:20 258:22, 24 259:2, 3 296:10 400:21 <b>detailed</b> 198:23 241:9 <b>details</b> 29:1 98:19 119:10 154:15 160:1 <b>determination</b> 74:6 376:24 377:3 <b>determine</b> 60:24 313:16 382:15 389:17 393:3 396:4 <b>determined</b> 380:17 <b>determining</b> 404:8 <b>detrimental</b> 339:12 <b>development</b> 111:12 334:23 335:1 339:24 340:5 <b>developments</b> 368:20 <b>devote</b> 307:16 <b>devoted</b> 150:20 340:17 <b>dial</b> 58:18 <b>difference</b> 11:13, 17 172:8 273:11, 14 305:19 404:17 <b>differences</b> 261:16 <b>different</b> 11:6 27:19 92:6, 14 110:7 120:8 130:12 142:16 193:4, 6 199:24 200:4 203:23 204:17, 21 219:12 223:9, 10 256:24 299:13 312:6	331:6 333:8 337:13 350:22 366:11 377:19 379:14 396:16 <b>differently</b> 137:10 <b>difficult</b> 100:20 171:11 172:6 183:13, 17 308:12, 13 313:22 331:1 <b>diminished</b> 363:14 <b>dinner</b> 77:14 <b>direct</b> 157:20 162:8 218:7 339:4 425:9 <b>directed</b> 166:9, 10 <b>directive</b> 255:2 <b>directives</b> 339:14 <b>directly</b> 41:8 89:5 116:23 158:15 214:2 246:1 254:24 321:17 333:2 349:2 391:10 <b>director</b> 68:21 69:1, 7 73:23 74:8, 24 75:6, 12 111:12 114:12 119:7 123:2 130:10 148:10 149:24 195:19 212:18 234:6, 13 236:4 245:20 252:21 306:4 313:24 314:1, 2, 10, 17 334:23 335:1 339:11, 24 340:4 343:16, 20 345:15 365:22 368:18, 23 375:10, 24 377:8 <b>directors</b> 44:10, 11, 13, 19 61:9 119:21 120:16 123:7, 19 124:2 126:6 230:9 421:4 <b>directorship</b> 140:5, 5, 6 212:22 <b>directs</b> 181:17 <b>disadvantage</b> 340:1 <b>disadvantaged</b> 340:5 <b>disagree</b> 52:8 58:14 195:7 255:16, 17 344:23 384:20 411:22 <b>Disagreement</b> 313:7	<b>disappear</b> 85:9 92:2 371:19 372:1, 9 <b>disappeared</b> 83:20 108:20 372:13 <b>disappointed</b> 241:7 320:2, 7 419:5, 7 <b>discern</b> 310:20 <b>discipline</b> 78:21 <b>disclose</b> 128:14 272:10 <b>disclosed</b> 406:15 <b>disclosures</b> 98:14 <b>discontent</b> 211:12 <b>discovery</b> 65:8, 20 67:8 75:21 112:8 241:7 292:7 401:20 <b>discrepancy</b> 178:16 405:6, 10 <b>discrimination</b> 81:20 109:4 117:18 118:8, 14, 15 294:6 327:24 332:22 366:22 384:11 <b>discuss</b> 90:24 255:3 270:10 271:9 304:5 413:12, 17 <b>discussed</b> 142:3, 15 229:18 249:13 280:10, 14 337:1 413:20 <b>discussing</b> 162:9 211:9 390:12 <b>discussion</b> 25:12, 13, 20 91:10 94:5 227:19, 20, 21, 24 228:2, 5 229:14 249:17 253:24 265:18 325:22 413:22 414:9 <b>discussions</b> 25:22 26:5, 10, 13 111:21 220:19 229:8 265:2 <b>disguised</b> 92:2 <b>disgust</b> 312:10 <b>dishonest</b> 93:1 <b>disinvited</b> 244:3, 12 <b>dislike</b> 321:21 339:20 <b>disliking</b> 312:9 <b>dismay</b> 92:9 <b>disparages</b> 114:3	<b>displeased</b> 116:5 314:8 <b>displeasure</b> 209:17 <b>dispute</b> 401:10 <b>disregarded</b> 337:15 <b>disrupted</b> 101:10 <b>dissuaded</b> 256:2 <b>distance</b> 93:14 <b>distancing</b> 6:2 <b>distinction</b> 108:11 <b>distinctly</b> 199:18 <b>distorted</b> 92:14 <b>distracted</b> 157:3 <b>DISTRICT</b> 1:1, 1 5:14, 14 <b>disturbing</b> 149:4 295:2 <b>divided</b> 260:3 <b>doc</b> 57:9 <b>docket</b> 162:4 <b>docking</b> 412:9 <b>docks</b> 414:14 <b>Docs</b> 121:6, 7 122:4 <b>document</b> 50:9, 12 51:9 52:1, 7, 11, 22, 23 53:5 54:3, 17, 19, 23 55:5, 8, 13 57:23 58:2 59:1, 8, 13, 20 60:3 61:14, 16, 17, 20, 21 62:8 64:15 66:16, 21 67:15 68:10 87:6, 9 88:23 92:24 98:4, 10 120:17, 20 127:2 150:13 153:2 176:3 191:19 192:11 214:18 240:18, 21 241:13 242:8 251:17, 19, 19 268:24 282:15 283:8, 18 292:4, 8 318:9, 11, 13, 22 319:13, 16 321:3, 3, 4 324:5, 8 336:5, 20 361:1 367:12 368:18 371:9, 10 373:16 374:20, 20 379:22, 23 381:8, 12, 19, 21 382:2, 12 383:20, 21 390:7 399:3 402:6, 7, 16 403:23 404:13
--	--	--	---

405:13, 21 426:10 <b>documenting</b> 349:16 <b>documents</b> 53:10, 15, 19, 24 54:4, 6, 18 55:20 56:12, 17 57:6, 10 58:3, 5 59:4, 6 66:4, 14 67:2 68:5, 12, 14 82:7, 10 112:14 113:3 115:5, 7 125:21 129:3 152:24 158:4, 6 172:18 187:14 218:4 283:4 323:22, 24 324:6 363:7 365:7 373:20, 24 395:21 396:8, 21 397:22 399:9 <b>document's</b> 360:15 <b>doing</b> 13:15 18:9 28:7 30:21 68:16 86:22 95:15 99:11 107:19 114:5 124:4 140:1 185:9 215:24 234:6 272:15, 16 278:19 303:13 305:14 307:19 308:3 310:1 318:2 323:22 326:3 341:16 342:2 343:6 352:18, 20 374:10 395:9 404:7 414:4, 18 416:8 423:21 424:14 427:13 432:8 <b>dollars</b> 95:20 99:1, 4, 15 <b>dominated</b> 141:18 <b>donated</b> 279:20 <b>donations</b> 38:14, 24 39:2, 5 43:19 425:22, 23 <b>donor</b> 265:1, 5 266:16, 22 267:1 268:2, 6, 7 424:15 <b>donors</b> 24:24 265:7 266:3, 6, 9 267:20, 23 269:2, 3 425:5 <b>door</b> 117:6 216:18 259:16 370:16 <b>double</b> 291:17 <b>doubt</b> 205:15	<b>doubts</b> 79:19, 21 123:12, 13 <b>download</b> 234:3 <b>downs</b> 308:17 <b>downstairs</b> 251:13 <b>Dr</b> 346:13 <b>draft</b> 83:11 218:13, 14 381:4, 5 <b>dragged</b> 212:19 <b>drastic</b> 211:7 <b>drill</b> 115:9 388:14 <b>drinks</b> 180:14 <b>drive</b> 8:23 110:18 266:10 349:9 <b>dropped</b> 110:6 <b>Due</b> 5:23 160:20 320:14 332:22 334:4 399:17, 18 401:11, 13 <b>duly</b> 6:22 431:5 <b>duties</b> 91:4 363:18 <b>duty</b> 77:23 272:9 273:24 274:4 282:8 <b>dynamic</b> 181:1  < E > <b>eager</b> 141:8 <b>ear</b> 193:16 212:20 <b>earlier</b> 13:22 70:5 91:5 94:23 125:2 131:8 135:24 136:3 140:10 141:15 251:20 305:18 323:6 361:23 362:8 370:24 410:13 <b>early</b> 12:11, 12 34:8, 10 37:16 70:6 94:17 117:5 118:6 131:7 134:10 135:11 169:15 177:5 202:16 341:5 <b>earned</b> 414:17 419:24 <b>easily</b> 23:13 395:11 <b>EAST</b> 1:6 2:11 5:13 6:13 7:6 9:11, 13, 15 10:13, 14, 17 11:19 15:13, 17, 21 17:15 26:21, 23 27:18, 22 28:15, 21 30:4, 7, 24 31:7 32:20 34:5 37:10 38:4, 13, 23	39:11 43:18 44:3, 7, 18, 21 45:7 49:19 50:14, 20, 21 56:8, 9, 13, 14 59:9, 21, 24 60:19 61:15, 18, 22 62:2, 6, 10 63:3, 11 64:9, 12, 19 66:18 67:5, 22 68:6, 13, 22, 24 69:7 70:14, 17 73:24 74:8, 24 75:7, 12 77:3, 7, 9, 22 79:2 84:20 85:13 89:10, 16, 24 93:3 95:15 109:13, 24 114:10, 12 117:17 118:7 121:1 128:20 130:11 133:14, 17, 21 134:7 152:19 155:14, 21, 23 156:7, 16, 18 157:14 159:1 162:12 184:4, 23 186:5, 9 195:10, 19 216:8 217:12 234:7 236:4 245:20 254:10, 12, 13 262:15 265:1 266:17 272:5, 11 285:21, 22 286:2, 7 287:18 288:10 289:1 290:17, 18, 23 296:18 297:18 306:5 327:3 328:10, 15, 20 365:18 371:16 373:5 374:12 376:4 377:13 424:13, 22 426:3, 8 427:20 <b>EASTERN</b> 1:1 5:14 37:6 102:11 145:18 192:7 316:14 429:20 <b>easy</b> 40:1 429:14 <b>editorial</b> 404:21 <b>editorializing</b> 405:3 <b>EEOC</b> 136:17 336:17 349:18 350:4 374:15 <b>eerily</b> 150:23 <b>effect</b> 81:15 106:18 187:15 233:10 248:15 <b>effectively</b> 130:16 153:10 255:20	423:19 <b>effects</b> 251:13 <b>efficacy</b> 186:21 <b>efforts</b> 12:16 <b>eight</b> 94:23 136:2, 6 164:5, 6 169:23 171:23 172:1 173:15 182:5, 9, 12 259:7, 9, 10 298:19 303:12, 15, 22 358:3, 6, 8 426:24 <b>eight-hundred-some</b> 98:9 <b>either</b> 14:20 55:15 77:17 183:5 205:5 254:21 265:19 330:6 372:3 392:7 395:8 429:8 <b>ejected</b> 89:11, 15 347:10 <b>ejected,</b> 89:17 <b>elaborate</b> 202:3 <b>elaborated</b> 199:22 200:9 <b>elaboration</b> 200:11 <b>elected</b> 317:6, 15, 17 318:1, 17 <b>electronic</b> 111:14 204:13 389:21 397:10 <b>Email</b> 103:12, 17 122:7, 19 124:11 130:13 170:4, 7, 10, 15 177:4, 19, 21 178:15, 20 189:16, 19, 22 190:2 192:11, 12, 12, 21 218:10, 10, 13, 15, 15 219:5, 5 223:23 226:11, 16, 22 228:4, 6 240:9, 22 242:14, 15 243:13, 18 247:18 252:6, 9, 13 262:20, 24 263:4, 8, 9, 12 264:4, 14, 15 292:9 293:5, 6 301:10 302:12, 14 306:12 312:22 316:17, 20 317:7 319:23 321:4, 6 330:20, 21 332:20 336:19, 21 337:15
--	--	---	--



<p>338:6, 13 339:10  340:14 345:18 347:2  353:23, 24 360:5, 7  362:12 363:3, 5  368:16 374:20  379:13 389:23  407:20 414:22 415:1  417:3, 19, 22  <b>Emails</b> 3:12, 15, 16,  17, 18, 19, 20, 22, 23,  24 4:4, 5, 6, 7, 8, 10,  11, 12, 13, 15, 16, 17  115:7 130:16 142:22  144:10 175:11 243:7  337:5, 9 342:17  369:6, 12, 19 370:16  385:15 389:21  397:23 418:19 420:6  <b>Eman</b> 349:9 418:11,  12, 17, 20, 23 428:14,  16, 17, 21  <b>embarrass</b> 346:4  <b>embarrassed</b> 152:1  <b>emergency</b> 102:2  <b>emotions</b> 308:19  <b>emphasis</b> 222:18  <b>employee</b> 26:20  27:17, 20 70:14, 17  108:22 109:2 114:10  116:11, 17 117:3  118:23, 23 119:3  148:9 189:12 238:20  285:21 286:2 287:18  332:24 377:21 379:5,  16, 18  <b>employees</b> 15:9  28:21 77:10, 24 78:5  79:2 108:8, 12, 12  110:4 114:3 118:13  119:6, 15 129:22  152:19 156:18  184:13 186:24  213:18, 20 214:7  217:7, 15 237:17  238:1, 9 256:3 257:6  298:7 332:23 338:8,  9, 10 342:3 367:19  376:10 409:1  <b>employee's</b> 186:3  237:14</p>	<p><b>employment</b> 29:2  89:23 156:21 189:12  249:9, 11 261:18  270:11 289:14, 15  320:15, 18 349:9  363:18 364:22 376:4  408:16  <b>en</b> 164:9  <b>encounter</b> 95:10  <b>ended</b> 91:4 96:7  120:8 309:6 408:16,  18  <b>Endless</b> 111:21, 21, 22,  22, 23  <b>endorse</b> 310:18, 19  383:4  <b>endorsed</b> 383:9  <b>endure</b> 321:19 331:18  <b>energy</b> 420:20  <b>enforce</b> 245:21  <b>enforcing</b> 327:24  <b>engage</b> 73:10 77:10  133:3 162:15, 17  186:11 210:21  216:14  <b>engaged</b> 29:1 186:8  214:13 287:16  337:23 343:2 428:9  <b>engages</b> 186:14  <b>English</b> 17:12 25:8  <b>enhances</b> 182:13  <b>enormous</b> 99:6  310:21 388:7  <b>entangled</b> 318:23  319:10  <b>enter</b> 416:17  <b>entered</b> 158:23  168:20 284:16  <b>enthusiastic</b> 85:6  92:4  <b>enthusiastically</b> 92:13  <b>entices</b> 214:16  <b>entire</b> 34:3 51:15  52:1 58:1 72:13  96:2, 24 147:22  152:24 198:2 243:12  314:16 359:16 419:3  <b>entirely</b> 92:6 157:21  204:12 286:9, 12</p>	<p>371:19 372:1, 9, 13  406:18  <b>entitled</b> 30:18 396:15  <b>entity</b> 10:12 155:13  <b>entrust</b> 424:14, 16  <b>environment</b> 312:11  <b>equal</b> 155:6  <b>equals</b> 300:3  <b>equate</b> 156:9  <b>era</b> 348:3 355:15  <b>Erica</b> 109:17  <b>errata</b> 432:7, 8, 11, 14  434:8  <b>errors</b> 363:11, 12, 24  364:2  <b>escalation</b> 198:21  <b>especially</b> 8:17  245:21 346:5  <b>ESQUIRE</b> 2:3, 8, 13,  21, 23  <b>essentially</b> 130:15  142:16 151:13  252:23 254:20 347:9  <b>EST</b> 5:10  <b>et</b> 1:6 5:13 173:24,  24 417:18  <b>ethical</b> 78:4  <b>evening</b> 106:17  190:12 401:2  <b>events</b> 135:23 241:9  347:8 418:10 420:3  <b>eventually</b> 308:3  <b>Everest</b> 5:16, 19  <b>everybody</b> 105:20  109:17 131:12 140:6  209:23 211:10  229:20 236:7 409:17  <b>everybody's</b> 335:9  <b>everyone's</b> 91:2  125:9 136:15, 15  153:11 158:14 185:3  <b>everything</b>, 102:19  <b>everything's</b> 132:8  179:21  <b>evidence</b> 96:19  165:24 241:10  279:16, 18, 19, 22  280:2 390:10 412:16  <b>exact</b> 38:8 75:18  152:4 170:20 174:21</p>	<p>190:2 218:10, 18  219:4 286:15 402:4  <b>exactly</b> 13:2 64:21  102:22 105:24  170:19 189:6 258:15  303:20 312:23 323:4  387:16 400:19 413:2  426:21  <b>exaggerate</b> 309:17  <b>exaggerating</b> 309:19  <b>EXAMINATION</b> 7:1  <b>examined</b> 6:22  <b>Examiner</b> 74:1, 9, 22  151:7  <b>example</b> 187:3  210:22 310:12  311:21, 22 340:21  375:22 388:13 420:3  <b>examples</b> 370:2  <b>excellent</b> 97:8  <b>exception</b> 91:3  229:19 421:4  <b>exchanges</b> 342:17  <b>excluded</b> 92:7 233:7  234:7  <b>excluding</b> 367:17  <b>excuse</b> 36:21 83:8  145:18 173:9 371:18  <b>excused</b> 429:23  <b>executive</b> 37:12 63:23  <b>Exhibit</b> 120:21, 22  121:9 217:17 218:8  241:23 242:3 243:10  247:22 264:18  <b>exhibition</b> 121:23  242:12  <b>EXHIBITS</b> 3:8 4:1  120:21 353:20  <b>exist</b> 401:19 422:17,  24  <b>existed</b> 399:9  <b>existence</b> 9:16  <b>exists</b> 50:6  <b>expand</b> 300:3  <b>expect</b> 422:9  <b>expeditious</b> 172:16  <b>expeditiously</b> 134:11  171:9, 22 217:19  239:5 428:24</p>
---	---	---	--

<b>expense</b> 310:18, 19 376:5, 8 377:7, 17 379:16	<b>fact</b> 6:5 12:20 15:8 54:14 74:16 85:2 86:22 92:3 95:10 132:7 150:7 168:15 174:11 248:12 251:1, 3 267:19 276:3, 20 320:14 368:5 379:7 405:2 420:6	347:4 350:11 419:22 427:12	419:15
<b>expenses</b> 376:11, 18, 20 377:12 378:22 379:6	<b>facts</b> 86:3 99:6	<b>feeling</b> 140:23 216:16	<b>finds</b> 131:12
<b>experience</b> 219:20 340:6	<b>fail</b> 432:16	<b>feelings</b> 363:10	<b>fine</b> 14:12, 19 35:14, 16 58:5 65:15 67:13 85:15 101:22 119:22 129:3, 5, 5 136:18 145:7 158:17, 18, 21 188:23 195:5 239:17 240:2 300:16, 20 303:11, 13 306:19 315:20 329:1 335:4 400:2, 8 416:24 421:5
<b>experienced</b> 227:3	<b>failure</b> 272:9	<b>feels</b> 222:5	<b>finish</b> 8:20, 21, 21, 22 20:4 29:16, 19 30:19 31:2, 4, 4 32:14, 15 46:13 47:15 49:3, 5, 8, 12, 17 54:5 72:2, 5, 6 84:9 101:9 124:18 128:23 137:24 163:3 201:10, 12 202:23, 24 203:9 211:3 216:4, 6, 7 220:21, 24 222:14, 23 224:10 225:15, 19 229:17 284:15 289:20 291:5 299:18 310:13 311:1, 4 315:6 324:20 325:1 326:18 335:13, 14 343:18 355:12 385:18 390:6 391:2 393:12 394:7 396:15, 22 410:23
<b>expert</b> 185:8, 12	<b>Fair</b> 42:2 85:7 143:4 246:16 273:22	<b>feet</b> 106:19, 22	<b>finished</b> 46:18, 19 47:24 48:4 59:23 60:2 87:15, 16 88:12, 13 120:12 138:1 242:6 324:18 326:20 391:21, 22
<b>expires</b> 434:16	<b>fairly</b> 118:21	<b>fell</b> 367:15	<b>finishing</b> 224:17 353:6
<b>explain</b> 48:15 100:12 167:15 183:22 222:6, 6 226:5, 19 259:6 260:12, 17, 20	<b>fall</b> 136:1 172:8	<b>felt</b> 137:4 140:21 164:11 182:18 189:7	<b>FINK</b> 2:22 26:1, 3 142:8 189:18 245:18 263:21 264:6
<b>explained</b> 64:5 91:20 180:21 183:18 313:22 314:24 320:22 425:2 427:18	<b>falls</b> 134:22	<b>female</b> 79:2 116:11, 17 188:2 189:13 237:17 238:1, 20 332:23, 24 342:3 367:19	<b>fire</b> 78:18 129:18, 21 133:2 147:1 183:8, 10 188:21 234:20 289:8 293:17
<b>explaining</b> 137:15	<b>false</b> 83:14 87:9, 12, 12 202:11, 14, 17, 21 203:12 380:19 382:17 389:18 390:9 393:4 396:5 404:9	<b>fiduciary</b> 282:8	<b>fireable</b> 312:7
<b>explanation</b> 168:11, 12	<b>falsehood</b> 85:23 92:16	<b>fight</b> 99:10 160:14	
<b>explicitly</b> 132:2	<b>fantasy</b> 85:16	<b>figuratively</b> 117:7	
<b>exposed</b> 108:19	<b>far</b> 15:24 16:9 24:16, 23 86:16 143:8, 8 160:19 162:2 202:2, 19 289:19, 20 307:22 309:3 358:15 406:14 414:17 418:10 425:24	<b>figure</b> 98:16 99:6 126:20 143:16 185:14 249:2, 10 307:17, 23 309:3, 18 313:2 424:18	
<b>exposition</b> 105:15	<b>far-reaching</b> 184:13	<b>figured</b> 371:3	
<b>exposure</b> 288:9	<b>faster</b> 191:2	<b>figuring</b> 142:18 417:11	
<b>expound</b> 222:3	<b>father</b> 137:1 138:15, 17 143:9 302:20 303:3 307:4, 12 407:4 408:11	<b>file</b> 330:10 332:12 344:15, 24 415:20, 22	
<b>expressed</b> 126:3 261:2	<b>fault</b> 158:2, 3 403:14	<b>filed</b> 81:20, 24 99:16 109:20, 24 110:1 349:18	
<b>extensive</b> 118:22 342:6	<b>favor</b> 8:20	<b>filing</b> 5:3 427:10	
<b>extent</b> 20:5, 23 59:4 66:21 151:15 228:15 248:2 265:15 276:4 295:14 345:4, 5 367:5 373:19 399:2 427:4	<b>favors</b> 137:1 138:15	<b>fill</b> 98:11, 11	
<b>external</b> 136:12	<b>fear</b> 183:6	<b>filling</b> 33:3	
<b>extra</b> 412:19 413:1 414:18	<b>feared</b> 373:7	<b>final</b> 417:6	
<b>extraordinarily</b> 427:8	<b>February</b> 168:16 169:9 420:14, 15	<b>finance</b> 368:22	
< F >	<b>fed</b> 314:7, 15	<b>finances</b> 29:2 320:10, 16, 23 362:20	
<b>face</b> 172:16 173:16 174:6, 8 200:23 201:1, 2 202:4, 16 210:4, 11, 19 211:4, 7 246:1	<b>Federal</b> 98:13 401:20	<b>financially</b> 99:7	
<b>faces</b> 134:14	<b>feel</b> 18:21 55:23 140:20 158:7 238:20	<b>find</b> 19:2 29:3 80:4 94:8 126:1 149:4 164:10 168:21 203:24 210:7 236:3 276:20 281:6 295:2 296:17 297:20 304:12 305:14 308:2 309:5 333:12 338:12 347:5 348:22	
<b>facilitate</b> 409:15		<b>finding</b> 120:17 299:12 300:16 404:6	

<p><b>fired</b> 132:12, 14, 16 183:6 235:7, 14 289:9, 11 306:14 351:1 <b>firing</b> 183:9 235:3 <b>Firm</b> 109:8, 18 161:1, 11 <b>first</b> 6:21 7:18 23:2 27:20 42:1 57:23 59:8, 8 60:2, 4, 5, 10, 11, 12, 12, 13 70:9 80:12 85:22 95:8 102:23 105:2 125:20, 20 126:10 127:23 136:6 137:3, 14 138:11 139:21, 23 162:21 193:10, 10, 22 198:20 199:22 204:5 206:8, 11 245:6 252:22 259:15 261:1 291:5, 5, 17 298:4 312:3 346:7 347:6, 16 350:1 399:18, 20 400:3 424:6 <b>fit</b> 257:9, 13, 17 <b>five</b> 56:18 62:14 63:22 85:12 91:4 94:4 95:14, 19 123:8 132:10 134:21 136:17 157:23 171:24 212:5 242:7 260:3 298:19 344:10, 19 397:3 421:4 427:9 <b>five-minute</b> 101:8, 20 <b>fix</b> 134:16 <b>fixing</b> 142:6 <b>focus</b> 223:16 231:18 233:9 272:23 422:5 <b>focused</b> 284:24 298:10 <b>follow</b> 17:23 424:15, 16, 17 <b>followed</b> 228:8 <b>following</b> 163:13, 17 164:1 244:19 270:1 337:1 338:20 339:2 <b>follows</b> 6:23 <b>foot</b> 96:5 171:1</p>	<p>212:14 <b>footing</b> 155:6 <b>force</b> 236:4 349:7 375:14 <b>forced</b> 107:13 339:22 <b>forcing</b> 364:8, 12, 18, 20 <b>foregoing</b> 434:4 <b>forensic</b> 210:21 <b>Forever</b> 197:23 <b>forget</b> 27:14 128:18 224:2 254:16 <b>Forgetting</b> 76:20 <b>forgot</b> 131:22 292:6 <b>forgotten</b> 129:16 <b>form</b> 5:4 10:21 13:17 14:3 16:16 17:2, 17 18:6 24:12 26:17 33:14, 20 37:23 38:15, 19, 21, 22 40:19 61:24 65:22 67:24 71:3, 15 74:11 75:1 76:8, 23 78:1, 12 79:4 80:17 82:4 86:9 87:24 89:13 90:9 91:22 93:7 100:5 103:1 105:11 107:4 108:13 111:16 116:12 123:21 125:6 128:9 129:24 131:5 132:19 133:13 134:2 137:2 140:16 141:4 144:7 146:1, 7, 15 147:2, 15 148:5 149:7, 16 150:3 151:2 152:7 153:15, 23 154:9, 17 155:18 156:12 157:16 158:9 161:5, 12, 20 164:23 165:9, 19 166:4 170:6 171:5 179:22 181:2 185:10, 19 202:9 207:20 208:14 210:9 212:23 214:4, 20 215:14 218:23 220:7 228:10 229:4 230:17 231:3 233:21 234:21 235:11 236:19 237:7, 19 241:17 244:5</p>	<p>246:2 253:5 255:10, 18 256:5 257:8 258:12 259:14 260:7 262:22 263:1, 16, 19 266:13 269:1 270:7 273:4, 10 275:10 277:20 278:2, 11 279:24 280:8 281:16 282:7 283:23 284:10 285:5 286:24 287:21 290:19 291:22 293:23 295:6, 12 296:2, 22 297:4, 9 298:5, 24 299:1 303:6, 18 304:21 306:1 307:21 310:4 311:11 314:20 317:10 319:2 322:13, 20, 24 326:23 329:6 333:20 334:1, 10, 19 337:16 342:5 346:17 348:11 354:2 355:24 361:1 362:21 364:10 366:23 367:13 369:8, 14, 20 371:23 372:15 374:14 378:8 384:13 406:21 411:8 413:13 422:21 423:3 426:9 434:7 <b>former</b> 338:10 <b>forth</b> 29:3 54:7 74:5 175:11 198:13 222:20 234:10 277:16 280:3 309:11 385:15 421:2 <b>FORUM</b> 1:6 2:11 5:13 6:13 7:6 9:11, 13, 15 10:1, 13, 14, 17 15:14, 17, 21 17:15 26:21, 24 27:18, 22 28:15, 21 30:4, 7, 24 31:7 32:20 34:5 35:1, 3, 8 37:10 38:5, 14, 23 39:12 43:18 44:7, 18, 21 45:7 49:19 50:14, 22 54:9 56:8, 10, 13, 14 59:9, 21 60:19 61:15, 18, 22 62:2, 6, 10 63:3, 12 64:9, 13, 19 66:18</p>	<p>67:5, 22 68:6, 13, 22 69:1, 7 70:14, 18 73:24 74:8, 24 75:7, 12 77:3, 7, 10, 10, 22 79:2 84:20 85:13 89:10, 16, 24 93:3 95:15 108:18 109:13, 24 114:10, 12 117:17 118:7 130:11 133:15 152:19 155:14, 21, 23 156:16, 18 157:14 159:1 186:5, 9 195:10, 20 216:8 217:12 234:7 236:4 245:20 254:10, 12, 13 262:15, 21 265:1, 2 266:17 271:10 272:5, 11 285:21, 22 286:2, 7 287:18 288:10 289:1 290:17, 18, 23 296:18 297:18 300:10 306:5 328:10, 16, 21 349:7, 10 365:18 368:3 371:16 373:5, 12 374:12 375:14 376:4 377:13 412:6 414:11, 19 420:20 424:12, 13, 22 426:3, 8 427:20 <b>Forum's</b> 44:3 60:1 252:21 <b>Forum-wide</b> 120:1 <b>forward</b> 23:21 43:7 121:22 258:10 262:6 366:21 <b>forward,</b> 124:20 <b>forwarded</b> 362:12 <b>found</b> 75:14 95:19 108:16 113:17 137:18 179:4 183:2 204:6 225:5 310:17 317:24 333:23 354:19 366:17 402:2 403:13, 14 428:12 <b>foundation</b> 76:9, 24 78:1 79:4 80:17 81:2 82:4 86:9 125:6 128:9 131:5 132:19 133:13 137:2 141:4 146:15 148:5</p>
---	---	---	--

<p>149:17 151:3, 12 152:7 165:19 166:19 167:6 214:21 236:20 256:6 279:10 299:2, 4 303:19 366:24 <b>foundations</b> 417:7, 9, 16 <b>Four</b> 40:14 56:18 110:6 124:8 139:23 158:15 187:12, 14 213:20 218:4 260:3 298:19 <b>four-page</b> 55:8 <b>fours</b> 21:2 <b>fourth</b> 262:17, 18 <b>Frank</b> 111:9, 11 119:12 298:17 <b>frankly</b> 57:12 313:20 420:23 <b>fraternizing</b> 93:22 <b>fraudulent</b> 272:14 <b>free</b> 18:21 55:23 256:18 364:18 411:21 <b>frequent</b> 128:5 <b>friendly</b> 423:12 <b>friends</b> 93:15, 17 155:8 305:19 <b>friendship</b> 93:20 308:22 <b>friendships</b> 180:3, 5 <b>front</b> 52:12 55:21 57:24 67:18 71:1, 13 73:24 74:9 116:11 153:10 176:3 184:23 208:20 217:17 218:6 263:21 300:24 301:5, 9 <b>fuckin</b> 277:3 <b>full</b> 9:7 96:10 141:21 204:8, 9 308:18 340:7 402:6 <b>full-bloomed</b> 117:6 <b>full-blown</b> 265:18 <b>full-time</b> 340:13 <b>fully</b> 13:9 136:14 <b>fun</b> 59:19 371:17 <b>fundraising</b> 136:13 347:8 423:11</p>	<p><b>funds</b> 186:23 267:2 417:11 <b>funny</b> 23:11 <b>further</b> 96:3 199:20 289:22 294:7 307:23 340:5 342:10 358:15 375:10 <b>future</b> 100:24 101:11 188:6, 19 248:16 256:18, 24 349:2 372:2, 4, 10 375:13 <b>future,</b> 371:20  &lt; G &gt; <b>Gabrielle</b> 70:16, 19 296:12 297:2, 19, 22 298:18 301:4 304:1, 12, 14, 24 305:10, 12, 22 306:5, 8 307:2 311:24 406:20 407:2, 12 408:2, 10 <b>gain</b> 267:18 <b>gala</b> 158:19 <b>Gambill</b> 104:15, 17, 18 <b>games</b> 55:15 139:14, 16, 21, 24 140:7, 9 <b>Gary</b> 104:15, 15, 16 304:7 349:9 <b>gathering</b> 142:17 <b>gearing</b> 370:5 <b>G-E-L</b> 9:23 <b>gender</b> 156:19 217:15 <b>general</b> 34:3 61:12 230:23 <b>generalizations</b> 341:11 <b>generally</b> 234:5 269:3 377:20 395:20 <b>germane</b> 371:1 <b>getting</b> 36:15 43:10 56:22 74:12 81:16, 16 153:9 175:16 208:13, 17, 24 234:8 239:23 272:16 309:8 310:14 316:1 349:24 353:15 401:9 407:17 <b>giant</b> 97:6 <b>gifted</b> 414:15 <b>gig</b> 418:10 <b>ginned</b> 203:1 <b>gist</b> 211:20</p>	<p><b>give</b> 7:13 30:12 38:8, 9, 18 43:14, 15 50:22, 23 73:15 74:20, 22 75:3 88:6, 11, 14, 17, 24 122:23 123:4 168:11 202:1 221:23 236:15 247:3, 3 283:5 290:17 310:11 311:21 329:9, 12 351:22 356:2 358:2, 6, 11 374:4 375:5 378:4 383:10 388:13 411:7 423:23 424:2, 9 425:6, 8, 8, 15, 15 <b>given</b> 86:17 98:16 99:6 406:10 431:8 434:6 <b>gives</b> 422:5 <b>giving</b> 110:22 136:24 267:21 284:20 311:22 321:21 336:3, 5 370:3 407:22 423:21 425:14 <b>glad</b> 50:16 260:8 <b>go</b> 18:24 20:6, 23 23:21 30:21 32:7, 14 33:7 38:19 40:3, 5 41:14 42:17 47:18 49:16, 17 52:3, 5, 9, 9 56:1 58:24 59:19 60:5, 9 62:13 66:22 85:20 87:6 88:23, 23 96:3 97:18 101:9 102:2 124:4, 5 127:6 137:24 144:19 146:16 153:7 162:24 163:3, 4 164:20 166:2, 2 167:13, 18 168:6 169:11 172:2, 2 176:2 180:6 182:24 186:9 195:5 200:12, 17 203:8 216:7, 15 218:5 219:23 221:8 222:14 223:14 224:11, 12, 13 225:20, 24 233:13 236:13 247:6, 7 259:12 260:21 262:6 265:16 269:4, 6 271:8 277:10 282:16</p>	<p>286:3 296:6 300:3, 8, 8 302:2 306:15 307:23 309:2 311:7, 8 318:5, 8 323:6, 13 324:23 325:7, 19 333:17 335:19 344:22 346:23 350:17, 18 359:1 374:5 387:6, 9 388:6, 24 390:12, 14, 15 392:11, 13 406:3 414:8 415:11 424:5 425:3, 5, 17 427:9 <b>god</b> 223:14 <b>goes</b> 40:22 41:8, 10 54:11 77:14 215:5 269:2 337:24 361:21 425:19, 20, 20 <b>going</b> 32:10 33:2 36:20 41:3 58:22 59:2 71:23 81:15 83:24 91:7 95:9 96:8 117:5 121:22 124:20 133:7, 9 135:16 140:4 149:18 169:17 172:13 181:20 184:18 186:7 199:16 212:9 224:7 233:9 240:8 256:3 258:9 265:10 280:3 292:3 297:1, 16 305:14 308:16, 21 310:22 313:2 323:19 329:12 331:23 332:1 334:23 344:10, 14, 19 346:15 353:8 367:9 370:18 414:6, 20 415:18 424:22 426:7 427:4, 11 <b>GOLD</b> 2:13, 23 <b>gonna</b> 7:14, 19, 20 8:10 16:4, 4, 8 17:14, 19, 23 18:10, 11, 16, 16 19:15, 16, 19, 21, 23 20:2, 10, 14, 18, 19 21:5, 10, 15 22:2 24:5, 10, 15, 18 30:5, 8 31:2, 16, 20, 22 35:23, 24 36:6, 9, 9, 11 41:4 42:19, 22</p>
--	---	--	---



48:8, 21 49:8 52:2, 3,  
5 54:20, 21, 22, 24  
55:1, 7, 10, 11, 12, 16  
56:19 57:7, 8, 9, 11  
58:3 59:7 66:20  
71:2 72:8, 14 73:10,  
11 74:5 75:10, 19  
84:9, 15 86:8, 9, 10  
88:11, 14 89:12  
96:14 107:4 112:6  
122:19 124:23 133:2,  
3, 4, 8, 11 134:16, 16  
137:4, 16 140:22  
145:3, 4 149:21  
154:14 160:13, 14  
162:8 167:1 174:9  
189:5 195:1, 3 196:6,  
13 200:16 209:9  
210:15 218:7 220:22  
221:6 222:10, 11  
223:3, 4, 14, 15, 16  
224:1, 5, 12, 13  
225:20, 24 228:17  
236:6, 14 240:5, 16,  
24 244:13, 23 247:21  
248:6 257:21 258:18,  
19 260:13 262:9  
263:8 271:15, 17  
276:2, 19 277:3  
283:2 284:11, 19  
292:5 293:4 311:18  
315:13 319:12 323:8,  
9, 12, 21 324:22, 23  
325:3, 7, 8, 17 329:8,  
9, 24 330:9, 9 332:4,  
11, 11, 12, 15 335:19  
341:2 342:22 343:18,  
19 344:15 345:9, 12  
351:12 353:22 357:2,  
6, 6 358:2, 24 359:1,  
3, 10, 18 360:6, 10, 22,  
24 362:9 365:6  
368:15 371:4, 8  
374:19 381:10, 14  
382:9 383:19 387:6,  
7 391:2 392:20, 21,  
22 393:18 394:14  
395:7, 8, 22 396:12  
397:6 401:24 402:21,  
23 403:5, 7 404:15

413:11 414:14  
415:11, 20 419:2  
423:8, 9 424:9, 10, 23  
426:2, 9, 21, 22, 23  
427:6, 6  
**good** 14:6 49:9 56:4  
81:16 85:5, 6 93:15  
97:4 157:24 160:12,  
16 181:11 196:11  
239:24 313:21  
318:23 319:9 333:22  
340:23, 23 359:14  
431:4  
**Goodman** 70:20 80:5,  
7, 16 81:5, 11 82:3  
132:17 133:4 152:16  
153:18 235:24 236:1  
237:4, 11  
**Gotcha** 122:5  
**gotta** 14:10 30:1  
44:24 47:11 52:22  
81:17, 18 82:21  
84:15 102:2 120:21  
145:2 209:21 233:12  
234:17 235:21  
238:15 263:9 278:20  
286:9 344:4 393:12  
401:8  
**governance** 50:24  
**governing** 189:11  
**Government's** 6:1  
**Governors** 44:22  
45:2, 5 60:20 61:1, 9,  
13, 15, 18, 23 62:3, 5,  
11, 16, 19 63:3, 12, 19,  
24 64:1, 7  
**GR** 249:8  
**Grace** 1:15 5:18  
221:8  
**grant** 265:23  
**granted** 346:14, 24  
**Grayson** 349:9  
**great** 101:23 132:1, 8  
142:3 201:22 238:10  
339:5 419:20 422:4  
**green** 81:14, 18  
233:10  
**Gregg** 2:16, 21 6:18  
7:6 12:15 13:24  
14:6 24:6, 10 25:17,

24 26:2, 16, 20, 24  
33:5, 9, 12, 15 34:12  
37:9 45:12 62:15, 18,  
21 63:6, 14, 18 64:6  
68:19, 21 70:24  
71:12 74:21 75:2, 10  
77:24 78:5, 18, 22  
83:17, 18 84:19 85:1,  
5 86:19 87:11 89:10,  
15, 23 90:16 92:5  
93:11 95:6 96:5, 6, 7,  
7, 8, 8, 9 97:1 104:13  
105:16, 17 107:7, 10,  
13, 23, 24 108:2  
109:2 111:3, 5, 21  
113:8, 22 114:2, 11,  
18 115:7, 20 116:10,  
16, 20, 23 117:13  
119:16, 20 121:19  
122:8 123:2 124:11  
126:3, 14 127:4, 16  
128:5 129:5, 19, 22  
130:24 131:14 132:9,  
12 133:2 136:5, 11,  
22, 23 137:6, 19, 22  
138:2, 14, 22 139:1, 2,  
4, 6 143:19, 19 144:2,  
6 145:21 146:13  
147:6 148:16, 23  
149:1, 1, 3 150:12, 18  
151:8 152:17 153:2  
154:5, 24 155:9, 12,  
20 156:10, 24 157:19  
158:21 159:15  
162:14 163:15  
164:16, 17, 21 168:9,  
14, 21 169:10, 17, 24  
170:1 171:17 173:6,  
9 177:7, 9 179:8  
181:17 183:12 184:6  
186:13, 19 188:5  
189:15 192:18 193:2,  
14 197:22 198:4, 17  
200:24 202:7 203:19  
210:13, 18 212:14, 15,  
18 213:23 214:16  
217:11 219:24 225:9  
227:24 228:13, 17, 23,  
24 229:1, 16 230:15,  
19, 22 232:3, 20

233:19 234:4, 20  
235:1 236:3, 12  
238:17 240:10 243:6,  
24 244:12, 22 247:9  
248:8, 13 249:19  
250:3 251:1, 3, 21  
252:20 253:14 254:4,  
14, 23 255:8 256:2,  
20 257:2, 5 258:7  
259:5 262:21 263:5  
273:20 275:7, 24  
276:6 278:8 292:19  
293:17 294:5 295:3  
298:21 299:6 300:10  
301:14, 15 302:10, 15,  
20 303:8, 23 304:7, 9,  
9, 15, 22 305:15, 22  
306:4 307:1 308:7,  
12, 15, 18 309:4, 17,  
24 310:1, 1, 18 312:3,  
4, 16, 20 313:9, 16, 24  
314:11, 19, 23 320:4,  
17 321:1, 12, 17, 20,  
22 329:4 333:2, 9  
334:6, 9, 22 336:14,  
23 337:11, 12, 12  
338:3 339:4, 6, 7, 8,  
10, 15, 22 340:4  
341:7, 9 343:8 347:6,  
10, 15 348:23 349:3  
350:4, 19, 24 351:3  
352:16, 19 354:4, 5,  
13 355:17 356:16  
360:8, 17 361:4, 24  
362:12, 13, 17 363:11,  
12, 23 364:6, 16  
365:17 366:20 367:9  
368:16 369:12  
370:11, 12, 12, 12, 18,  
21 371:1, 5 374:24  
375:3, 13, 18 377:1, 9  
380:2, 18 382:16  
385:1 386:6, 8  
389:18 390:1, 9  
407:1, 21 418:12  
420:19 421:3 422:7,  
12 423:8 428:4, 5, 11  
**Gregg's** 37:20 63:24  
114:20 127:19  
138:20 139:3 140:7

<p>207:16 209:17  211:16 252:24  271:10 308:10, 18  310:2, 10, 16, 19  311:10, 19, 20 312:8  320:15 332:22 337:6  375:16 380:5, 17  382:15 406:11  <b>grievances</b> 227:24  <b>gross</b> 22:22 429:12  <b>ground</b> 254:1  <b>grounds</b> 172:20, 20  211:11 402:13  <b>GROUP</b> 2:1 108:16  109:8, 12, 15 110:2, 8,  12 147:7 158:23  243:13 340:22  <b>Guardian</b> 288:22  371:12  <b>guess</b> 23:12, 14  109:21 110:11  120:22 140:23  242:10 244:20  246:10 247:22  248:14 251:16, 18  252:4 295:11 424:24  429:12  <b>guesses</b> 295:4  <b>gunning</b> 312:8, 8  337:21  <b>guy</b> 210:15 286:23  414:19  <b>guys</b> 12:3 13:14  30:1, 12 37:7 39:5  44:12 47:11 48:8  66:24 82:21 101:19  102:1 110:14 112:6  122:18 144:20 161:3  168:3 178:3 205:12  209:7 221:4 249:1, 7  263:8 265:12 310:14  358:2 359:12 381:7  394:5 397:5 401:8  424:21 426:1, 7, 20, 24</p> <p>&lt; H &gt;  <b>hair</b> 234:9  <b>half</b> 191:17 265:20  277:9 335:20 358:3,  8 361:23 363:5</p>	<p>370:24 372:22  426:24  <b>halfway</b> 394:19  <b>hand</b> 54:12 193:21,  23 195:20 199:20  201:5 205:1, 3  206:10 207:16  212:18 234:11  314:14 431:11  <b>handed</b> 251:8, 8  413:2  <b>handing</b> 54:3  <b>hand-in-hand</b> 347:9  375:2, 3  <b>handle</b> 140:2  <b>handled</b> 53:24  217:22 238:22 239:4,  4  <b>handles</b> 53:22 54:6  <b>hands</b> 239:10 302:10  312:10 371:2  <b>handwritten</b> 95:2  103:14 139:24  170:14 177:4 178:12,  14, 19  <b>handwrote</b> 125:22, 23  <b>Hang</b> 179:7  <b>happen</b> 31:22 37:15  55:11 203:15, 16  213:15 247:17  250:11 258:18  266:10 383:7, 8  <b>happened</b> 13:14  20:24 50:22 64:22  92:15 94:22 95:5  96:13 106:12, 15  131:8 132:17, 20, 21  135:11 159:9 164:8  170:13, 17 174:10  202:22 203:14, 18, 22  206:14, 21, 23 210:7  213:15 237:12  239:21 259:24  260:12 284:24 339:2  354:18 355:18, 22  366:10, 11 371:22  372:19, 23 390:18  397:20 406:7 407:24  412:18</p>	<p><b>happening</b> 322:11  345:2  <b>happens</b> 359:10  396:11  <b>happiness</b> 91:2  <b>happy</b> 8:14 30:12  43:4 123:9, 10, 11, 14  129:4 153:1, 2, 4  197:24 198:1 199:4  211:10 219:15  251:21 277:11 281:6  380:14 412:4, 8  <b>harass</b> 295:9, 24  <b>harassed</b> 298:20, 22  303:23 304:2  <b>harasser</b> 246:1  <b>harassment</b> 79:14  106:3 110:19 116:18  117:18 118:8, 14, 15  149:12, 15 154:5, 16,  22 157:15 164:12  177:23 211:15  215:12 233:5, 6  238:21 245:24 294:6,  8 295:4, 10, 23 299:6  306:14 322:12, 15  328:1 332:23 336:22  337:1, 3 349:5  366:21, 22 367:17  384:11  <b>hard</b> 110:18 115:14  117:8 135:5 137:12  171:3, 7 266:10  290:6 338:10  <b>harmful</b> 186:9, 11, 15,  16, 18, 19  <b>harsh</b> 124:15  <b>hating</b> 111:21, 22  337:22  <b>have,</b> 112:19  <b>head</b> 21:3 31:6  32:22 93:12 119:14  134:8 184:24 186:20  248:23 250:19 271:6,  10 343:7  <b>health</b> 119:24 120:3  123:5, 10, 12 366:14  367:10 368:2, 4, 9  429:3</p>	<p><b>hear</b> 8:18 14:12, 14,  19 35:13, 14, 16  44:24 54:4 69:23  74:12 79:7 81:8  83:8 87:1, 4 90:19  91:8 94:6 95:16, 17  105:21 106:10  107:24 108:5, 24  115:15 118:17  120:10 130:4 137:11  138:22 141:23  144:15 175:13 178:3,  3 230:7 244:6  245:15 257:19, 22  276:17, 23 278:16, 16,  21 286:20 287:7  290:1, 3, 6, 9 300:11,  15 304:16 306:15  308:14 317:2, 21  318:4 330:6 332:17,  17 337:11 355:10  363:8, 19 364:19  376:14 408:8 409:12  414:12 428:3  <b>heard</b> 73:23 76:3  80:8, 11, 12 81:3  91:14 94:3, 9, 12, 14,  15, 16, 24 95:1, 9, 17  102:23 108:1, 9  109:5 114:9 115:1,  18 128:1, 2 133:6, 12  138:11 151:6, 9  185:17 207:6, 18, 24,  24 220:1 237:1  238:11 267:19  275:24 276:6, 8  308:19 337:10, 11  355:8, 12, 13 400:22  418:18 420:4  <b>hearing</b> 76:7 94:20  102:17 250:18  <b>hearsay</b> 152:14  <b>heart</b> 155:9  <b>he'd</b> 306:14  <b>held</b> 25:19 85:3  91:10 117:20, 22  264:5 325:22 339:16  354:8  <b>hell</b> 345:7  <b>Hello</b> 341:22 428:22</p>
--	--	---	--

<b>help</b> 63:17 167:12 197:17, 19 241:12 267:5, 17 272:21, 23 276:16 283:9 290:17 409:15 414:21 417:17 422:12 423:11	194:14 270:14, 14 298:24 414:5 <b>Hollin</b> 45:11 <b>Hollin's</b> 45:17 <b>honest</b> 9:4 <b>honestly</b> 72:12 350:9 <b>honesty</b> 218:3 <b>hope</b> 261:15 342:21 <b>hostilities</b> 354:5 356:16 360:9, 18 361:20 362:1 <b>hotbed</b> 309:9 <b>hotel</b> 77:15 150:12 151:8 165:18 169:11 214:17, 18 236:14 <b>hour</b> 27:3 54:22 55:8, 10 191:17 240:23 335:20 356:3 415:7 <b>hours</b> 57:8 58:4 71:23 265:20, 20 332:15 345:8 358:3, 8 365:4 416:2 426:21, 24 <b>house</b> 142:8 <b>How'd</b> 411:10 <b>huge</b> 350:7 <b>Huh</b> 406:22 <b>human</b> 119:7 148:10 149:24 250:19 328:6 <b>hun</b> 404:7 <b>hundred</b> 98:23 380:18 382:16 389:17 390:9 399:23 400:5 402:2 404:8 <b>husband</b> 106:8 174:5 <b>hush</b> 296:24 <b>hypothetical</b> 76:24 150:4, 6 166:16 215:1 234:22, 23 236:20 238:24 246:4 279:9 294:9, 14 296:1 327:10, 14, 23 <b>hypotheticals</b> 71:23 72:8, 20, 23 73:5, 9, 13 133:3 <b>&lt; I &gt;</b> <b>idea</b> 13:9, 10 14:6 84:24 85:2, 6 93:15	113:16 126:19 128:17 135:1 137:16 139:8 140:3, 21 156:4 180:11 181:11 206:23 277:5, 16 307:5 323:18 344:9 406:16 413:24, 24 417:10 <b>ideal</b> 153:6 <b>ideas</b> 142:16 422:4 <b>identify</b> 52:21 59:13 68:15 86:12 <b>ignorance</b> 261:2 <b>ill</b> 126:5 <b>illegal</b> 79:3, 9, 9, 13, 14, 17 <b>imaginary</b> 198:22 199:19 <b>imagination</b> 83:7, 9, 10 <b>imagine</b> 239:6 <b>Imagined</b> 83:4 309:8 <b>immediately</b> 132:16 178:24 235:7 238:18 250:12 380:4 <b>immunity</b> 355:18, 21 356:2 <b>imperative</b> 432:13 <b>implausible</b> 203:24 <b>implemented</b> 320:3 <b>implicate</b> 330:24 <b>implicates</b> 329:21 <b>implication</b> 101:1 <b>imply</b> 188:21 <b>implying</b> 84:24 188:17 <b>impolite</b> 315:9 <b>import</b> 310:21 <b>important</b> 7:24 8:16 9:3 46:7, 8 47:19 49:16, 18, 21 89:5 125:12 127:1 128:7 217:4 269:8 355:9 424:18 <b>importantly</b> 374:22 <b>imposed</b> 366:20 <b>impossible</b> 290:9 <b>improprieties</b> 253:1 <b>impugn</b> 168:21	<b>inaccurate</b> 108:19 <b>inadvertent</b> 402:12 <b>inappropriate</b> 92:20 106:2 107:2, 11, 17 169:10 212:20 219:18 220:12 222:16 227:11 302:15 303:2 386:23 <b>inappropriately</b> 107:14 <b>Inaudible</b> 24:7 27:10 44:23 51:15 58:4 73:18 78:7, 13 79:5 81:7, 17 86:24 87:13 90:18 93:21 95:14 99:8 100:15 106:9 108:4 111:1 113:1 115:11, 13 118:16, 20 139:11 141:6, 22 144:13 148:24 154:20 156:2 172:19 174:10 204:13 269:8, 23 270:2 288:4 298:3 300:6, 9 311:21 314:9 315:5 318:3 343:6, 17 350:15 376:13 379:9 388:22 409:14 413:24 414:4, 11 <b>incessantly</b> 142:2 <b>incident</b> 107:15 192:22 208:9 219:21 227:4 241:8 312:17, 18 <b>incidents</b> 390:11 <b>include</b> 40:16 103:20 148:11 357:14 <b>included</b> 150:7 247:9 412:9 <b>including</b> 155:3 239:23 249:14 262:16 343:2 354:9 363:13, 15 <b>income</b> 267:18 368:5 <b>incomplete</b> 76:24 214:24 234:22 238:23 284:20 393:19 <b>incomprehensible</b>
--	--	---	---

276:3, 21	358:13 365:11 382:7	216:15	355:23 417:9 431:9
<b>inconsist</b> 206:3	383:17 384:22 386:3,	<b>inquired</b> 199:16	<b>interfere</b> 387:4
<b>inconsistencies</b> 206:4	20 390:3 391:8, 13	<b>inquiries</b> 311:23	<b>interject</b> 387:4
291:21	392:5, 15, 24 393:22	<b>inquiry</b> 174:6 211:6	393:11
<b>inconsistency</b> 205:8,	394:2, 24 395:14	241:6	<b>intern</b> 147:24 212:16
14, 18 206:1	397:1 399:6, 13	<b>inquisitive</b> 105:19	214:17 304:12 306:5
<b>inconsistent</b> 194:1, 2	401:16 403:20 404:1,	<b>ins</b> 425:12	<b>internal</b> 68:12, 14
203:17	19 411:13 421:16	<b>instance</b> 186:6	265:1 304:6
<b>increase</b> , 419:8	426:15	406:11 428:10	<b>interpersonal</b> 312:13
<b>increased</b> 199:19, 20	<b>individual</b> 16:11 28:1	<b>instances</b> 110:7	<b>interpret</b> 172:13
219:21 227:4	<b>individually</b> 164:14	240:17, 19 336:22	220:3, 9
<b>incredible</b> 342:21	<b>individuals</b> 126:13	<b>institution</b> 216:15	<b>interpretation</b> 162:20
<b>incumbent</b> 135:11	152:14 158:15	<b>instruct</b> 86:11	<b>interpreted</b> 227:15, 16
<b>INDEX</b> 3:1	185:12	166:21 167:5	<b>interrogatories</b> 66:1,
<b>indicate</b> 6:7 166:6	<b>indulgence</b> 120:19	<b>instructed</b> 196:13	7, 11
167:23 168:6 274:10	<b>inflicted</b> 85:1	<b>instructing</b> 42:23	<b>interrogatory</b> 28:10
<b>indicated</b> 136:3	<b>influence</b> 239:22	166:19 404:12	<b>interrupt</b> 18:11 19:5,
158:17 173:23 431:5	<b>inform</b> 403:13	405:20	6, 16, 23 20:3 21:15
<b>indicates</b> 166:11, 12	<b>information</b> 32:16	<b>instruction</b> 162:1	22:1, 8 30:5, 8, 19
168:8 389:24 390:8	51:24 127:9 136:4	167:2, 20 196:5	77:6 84:4, 15 114:23
<b>indicating</b> 153:1	142:17 199:8, 9, 12	<b>instructions</b> 7:14	171:21 210:15
<b>indication</b> 164:13	202:19 226:20	74:12 163:13, 17	227:23 311:5 356:10
183:5, 7, 7	261:11, 11 267:1, 5,	164:1 375:6 432:1	385:21 390:23
<b>indiscretions</b> 191:5	17 268:4, 5, 16, 17, 20,	<b>instructs</b> 73:12	393:11 410:9, 17
<b>Indistinguishable</b>	21 269:8, 11 270:6	<b>insurance</b> 232:15	<b>interrupted</b> 21:21
21:13 25:15 29:14,	274:5, 14 312:2	366:14 367:10 368:2,	32:10 54:2 84:12
23 30:10 32:2 42:6	313:1 315:3 365:5	4, 9 429:3	224:1 345:6 388:23
47:1, 9 51:20 52:16	406:15 407:17, 23	<b>intellectual</b> 28:24	<b>interrupting</b> 21:24
53:2 65:12 67:10	<b>informational</b> 262:1	<b>intend</b> 341:1	22:3 29:11 31:14, 16
72:17 82:17 100:17	<b>informed</b> 261:8	<b>intense</b> 94:5 309:10	46:11 84:8 110:11
101:3 121:3 152:10	<b>informing</b> 261:6	312:12	200:15 201:8 358:16
158:11 159:22 167:8	<b>inherent</b> 404:10	<b>intensely</b> 142:17	391:19
168:1 173:11 188:10	<b>initial</b> 87:8 99:6	229:17	<b>interruption</b> 209:8
190:16 194:18	136:3 193:4, 5, 6	<b>intention</b> 16:3, 23	<b>interruptions</b> 8:24
195:16 205:10	205:1 286:8	18:4 19:4, 8 183:9	<b>interview</b> 103:23
207:14 209:5 211:18	<b>initially</b> 243:24	247:10, 14	104:3, 5, 9 105:1, 2
214:10 221:2, 11	247:7 288:5 367:23	<b>intentionally</b> 344:17	143:22 144:11 148:7
233:15 235:16	<b>initiate</b> 84:21	<b>intentions</b> 19:13 21:7,	418:12 419:19
236:10 239:13	<b>initiated</b> 84:22 87:14	9	<b>interviewed</b> 103:6, 17,
257:24 260:10	90:14, 15 92:12	<b>intents</b> 339:15	21, 21 104:12, 22
267:10 269:20	261:9 307:24 308:2	<b>inter</b> 46:11	141:16 142:15 148:1
270:24 274:20	355:15	<b>interaction</b> 183:21	<b>interviews</b> 105:4
277:13 282:1, 19	<b>initiation</b> 83:19	<b>interactions</b> 202:1	142:12
288:1 291:2 299:16	342:11	272:12	<b>intimate</b> 154:15
302:4 305:2, 8 316:3	<b>initiative</b> 83:17, 18	<b>intercourse</b> 162:18	<b>introverted</b> 419:18
322:2 324:11 325:5	86:23	<b>interest</b> 13:15 349:4	<b>invest</b> 39:5
327:18 331:9 332:7	<b>in-office</b> 124:13, 15	350:13 420:20	<b>invested</b> 39:12 40:6
335:6 338:23 341:19	127:16 128:2	<b>interested</b> 76:7	<b>investigate</b> 133:8, 11,
343:22 351:16 353:2,	<b>inquire</b> 199:9 211:3	334:17, 21 336:9	23 143:13 241:19
13 356:8 357:24			293:15 297:17 298:3



<p>307:12 309:13  340:12, 13 355:2  384:10, 15 385:3, 5  388:21  <b>investigated</b> 71:21  74:2 75:17 134:11  136:10 152:23  156:24 157:9 158:13  178:23 179:2 184:15  209:22 296:16  297:14 304:20 385:7  <b>investigating</b> 237:13  304:22 384:7 385:9  <b>investigation</b> 141:13,  14, 16, 17 142:20  144:12 148:2 179:14  210:21 240:10  241:15 242:17  313:15 314:12  380:16 382:5, 15  383:8, 13 384:2, 5  402:2 404:8  <b>Investigator</b> 179:18  388:8, 10, 11, 19  <b>investment</b> 44:3  <b>invite</b> 245:5, 13, 14,  16, 17  <b>invited</b> 117:10 163:4  168:14 169:18  171:18 243:24 247:7  <b>involve</b> 320:16  330:15  <b>Involved</b> 17:4, 6, 10  20:13 24:5 43:10, 11  89:6 158:16 234:19  286:1 347:8  <b>involves</b> 281:21  <b>irony</b> 18:13  <b>irrelevant</b> 22:23, 24  <b>IRS</b> 38:22  <b>Israel</b> 94:22 95:5, 11  106:6 135:11, 22  163:4 168:14 169:11  170:2, 13, 17 173:21  174:3 180:14 182:1,  5, 24 190:23 191:6  219:21 227:4 390:12,  15, 18 398:3 401:4, 5  <b>issue</b> 56:10 96:14  119:24 120:1 125:15</p>	<p>161:23 187:12 198:3,  14 213:4, 5 217:19  220:17 241:21, 22  267:21, 21 297:7  305:16 312:6, 7  426:23  <b>issued</b> 113:4 297:18  <b>issues</b> 86:12 106:1  120:5 152:22 153:10  155:3, 3 171:12, 13  187:9, 11 213:9  217:16 234:14  269:17 272:23  311:23 315:1 319:10  355:1 363:13 381:6  <b>issues,</b> 318:24  <b>it'd</b> 35:12  <b>it'll</b> 121:13  <b>its</b> 67:23 79:19, 21  80:14 237:1    <b>&lt; J &gt;</b>  <b>Jack</b> 346:8  <b>James</b> 40:8, 9, 13, 16  <b>January</b> 10:7, 11  384:12  <b>jcavalier@cozen.com</b>  2:10  <b>Jeannine</b> 56:5  <b>job</b> 33:3 68:17  111:11 130:13  136:24 138:18 140:1,  2 156:9 185:23  186:2 216:13 217:6,  6, 10, 13, 14 225:12  245:20 268:13  285:23 286:6 301:23  308:18 312:9 328:2,  5 332:21 334:16  335:22, 24 336:9, 11,  11, 12, 13, 14, 15  338:12 340:23, 23  356:4 379:2, 4  <b>jobs</b> 31:7 75:6  182:18 337:22  <b>Jon</b> 6:12 18:9 31:22  35:13 36:8, 21 49:9  54:21 65:15 66:23  82:13 84:5, 11  101:22 134:5 145:1</p>	<p>161:23 167:13, 21  195:18 196:11  224:14 226:5, 10  246:11 272:1 315:23  326:3 330:10, 20  335:19 344:4 358:18  398:19 401:7 405:6,  9 426:17  <b>JONATHAN</b> 2:8  <b>Judge</b> 18:10, 18 41:5  42:17, 24 43:10, 11  54:21, 22, 24 55:2, 16,  17, 18 56:4 57:1, 16,  22 58:19 73:12  160:22 162:5 167:1  195:8, 9, 23 196:6, 8,  9, 12, 15 375:6  <b>Judging</b> 421:12  <b>judgment</b> 73:17, 18  160:17  <b>July</b> 345:18  <b>jumbled</b> 223:5  <b>jump</b> 246:11  <b>June</b> 136:16 159:8  316:18 318:22  319:23 321:5 336:4,  20 338:13 341:5  352:9, 10 363:19, 21  371:11 374:2 405:8  420:11, 13, 17  <b>junkie</b> 183:20  <b>jury</b> 41:12 208:20  341:1  <b>justifies</b> 422:13  <b>justify</b> 423:16    <b>&lt; K &gt;</b>  <b>keep</b> 18:9 22:3  31:15 38:24 39:2, 6  40:15 43:3 57:20, 21  58:22 59:1 68:16  83:24 84:8, 9 93:9  120:21 125:21 127:2,  4 128:13 171:19  173:2 177:19 215:19  233:9 240:8 259:7  292:3 361:3 374:10  408:20 409:6, 19, 21  411:4 412:13, 23</p>	<p>413:5, 21 414:2  416:23  <b>keeps</b> 347:8 365:21,  21  <b>Ken</b> 109:16  <b>kept</b> 93:14, 16  115:23 140:4 367:23  <b>key</b> 54:11 247:8  249:19, 22, 24 250:6  251:2, 3, 11 362:16  378:4 380:6, 7  418:22  <b>kids</b> 290:12, 24  291:12  <b>kill</b> 175:4, 6  <b>killer</b> 151:22  <b>kin</b> 431:9  <b>kind</b> 8:2 23:4  116:18 171:20  174:12 300:6 330:17  414:10  <b>kinds</b> 281:22  <b>knew</b> 71:20 110:5  124:22 169:16, 16, 17,  17, 18, 19, 19, 21  180:12 182:23  259:16 261:17, 18, 19  262:17 272:10 274:6,  8 289:12 291:11, 13  304:7 348:21 397:17  414:19  <b>knife</b> 174:24  <b>know</b> 8:2 11:12, 15,  21, 23 13:19 15:24  16:1, 9, 13 17:6, 9, 12,  12, 21 21:1 22:5, 17  25:5, 7 27:6 28:8  29:5 33:1, 13, 15, 16,  18, 19 34:1, 17, 20  35:18 39:13, 21  41:13, 13 43:20  44:14, 16 48:9 50:1,  4, 13, 15 51:5, 12  53:7, 14, 15, 18 54:10,  13 55:13 56:15, 17  57:17, 23, 24 58:8, 18  59:15, 21 61:16 63:7  64:12 65:1, 5 66:1, 3,  23 67:4 70:19, 20, 21,  22, 24 71:7, 12, 18, 19,</p>
---	---	---	--

<p>19 76:14, 15, 16, 18 77:11, 18, 21 79:15, 18, 23, 24 80:3, 7, 21, 22, 22, 23, 24 81:14 82:2 84:14 97:23 98:14, 19, 20 99:4, 13, 18 101:15 106:3, 8 107:17 109:11 110:17, 18, 20, 23 111:15 112:24 113:16 116:21 117:1, 2 118:20, 22 119:9, 14 125:2, 16 126:14, 21, 24 128:16 130:24 131:3, 6, 7 132:21 135:9 137:20 138:9 139:5, 14 140:7, 8, 9, 10 144:8, 11 146:13 147:10, 12, 16, 19 151:4, 16 152:2 155:16 156:6 158:2 159:24 160:2, 4, 6, 13 162:13, 14 163:1, 6, 7 164:12 165:6, 7, 20 168:12 169:2, 14 170:9 172:14 174:3 178:1, 5 180:11, 12, 13, 14, 15 183:1 185:20, 23 186:2 187:14 190:9 194:1, 3, 13, 15 196:17, 21 199:1, 23, 24 200:2 201:3 202:13, 15, 17, 22 203:11, 14, 15, 21, 23 206:21 209:8 210:13, 18 213:5, 13, 14, 15, 16 217:3 221:24 222:12, 13, 24 223:1 229:6 230:14 234:14, 18 235:9 236:22 237:1, 2, 3, 4, 8, 9, 10 239:21 241:4 242:3 248:22 249:1, 6, 16 250:13 251:1, 3, 6, 11 252:7 255:19 256:2, 8, 9, 11, 22 258:9, 15, 16, 24 259:8 261:20, 22 262:18 265:2, 6, 17 266:24 267:4, 23</p>	<p>268:1, 3 269:6 273:5, 14 274:11 275:2 276:8 277:6 279:15 283:20 284:7 286:14, 17, 21 287:22 288:16, 17 290:8 291:13 293:21 294:3 295:1, 3, 13, 22 296:7, 9, 13, 20 297:10, 13 298:17 304:10 306:7, 9 307:7 309:20, 22 310:15 312:21 313:8 314:11 317:5, 19, 22, 23 322:17 327:14 332:13 337:14 340:10 341:8, 9 343:4, 5, 6, 7, 9, 9 344:5 345:23 346:1, 2, 5 350:9 351:9 353:20 355:3, 4, 5, 7, 16 356:24 357:1 358:22 359:13, 15 361:22 371:3, 14 374:5, 18 376:6, 7 378:12, 19, 24 379:1, 14 380:23, 24 382:23, 23 388:19 389:7 393:14 396:16 397:8 398:7, 8, 8 399:9 400:17, 20 402:11, 19 405:13, 14 407:6 409:11, 13, 17, 18 411:11 413:9, 10, 15 415:4, 19 416:7, 21 417:12, 24 418:7, 8 419:1, 23 420:8 423:22, 23 424:1, 3 425:12, 16 429:4, 6, 8, 10, 11 <b>know</b>, 7:22 59:10 351:10 <b>knowing</b> 269:4 333:1 334:8 338:11 340:6 <b>knowledge</b> 109:21 114:1 282:22, 23 <b>known</b> 73:21 76:12 349:7 354:6 362:1 374:7 424:12 <b>knows</b> 27:7 33:9, 16 110:13 115:24 172:3</p>	<p>223:14 254:23 344:11 420:23 424:8  &lt;L&gt; <b>labeled</b> 55:14 <b>labeling</b> 121:24 <b>lacerating</b> 115:8 <b>lack</b> 151:12 152:8 166:18 167:5 214:21 256:5 261:24 279:10 299:1 303:19 366:24 403:10 <b>ladies</b> 428:13, 15 <b>lap</b> 193:16 203:20 204:15, 19, 24 205:4 206:10 207:19 212:19 <b>laptop</b> 408:21, 23 409:3, 5, 7, 10, 14, 19 410:3, 6, 12 412:7, 17, 20 413:3, 6, 21 414:2, 4, 10, 16 <b>laptop</b>, 408:20 <b>laptops</b> 408:24 <b>Lara</b> 110:2, 10, 14 111:3, 13 113:20 119:13, 13 298:17 <b>Lara's</b> 111:2, 6 <b>large</b> 150:18 242:8 <b>largely</b> 422:10 <b>larger</b> 258:23 427:24 <b>large-scale</b> 148:15, 20, 22 <b>late</b> 12:11, 12 37:16 106:17 341:5 350:3 <b>Laterally</b> 96:17 <b>Laura</b> 110:3, 10, 15 111:8, 11, 13 113:20 119:12 298:17 <b>Laura's</b> 111:8 <b>LAW</b> 2:1 11:20 15:22 16:1 41:14 43:4 108:15 109:7, 8, 12, 15, 18 110:2, 8, 12 147:7 158:23 273:2, 6, 9, 12, 15, 21, 24 293:22 294:2, 3, 21 296:7, 9 340:22 <b>law</b>, 273:20 <b>lawbooks</b> 16:2, 13 19:2 <b>Lawrence</b> 45:11, 17 <b>laws</b> 18:23 19:1 21:1 160:1 <b>lawsuit</b> 85:13 <b>lawsuits</b> 85:1 95:21 101:12, 12, 16 136:17 214:13 229:22 370:5 <b>lawyer</b> 20:1 108:16 161:19 242:2 284:16 349:15, 19, 23, 24 350:1, 2, 12, 13, 17, 18 <b>lawyers</b> 54:6, 13 110:7 161:7, 17 252:18 <b>Lea</b> 147:13, 20 149:5, 11, 14, 19 150:8, 11, 14, 22, 23 152:5, 6, 16 153:18, 21 154:6 213:4, 8, 9 298:14 <b>lead</b> 85:5 235:2 <b>leadership</b> 28:24 32:23 <b>learn</b> 141:9 170:21, 24 <b>learned</b> 77:13 173:7 180:15 201:3, 22 202:7, 10 226:20 313:11 317:7 348:20 366:13 368:1 403:13 404:6 <b>learning</b> 178:24 <b>leave</b> 104:22 193:12 266:23 318:23 319:9 349:12 401:19 410:13 <b>leaving</b> 413:3 <b>led</b> 93:18 <b>Lee</b> 70:13 108:3, 14, 20 109:20, 22 113:20 298:16 <b>leery</b> 376:1 <b>Lee's</b> 109:4 <b>leeway</b> 265:24 269:16 <b>left</b> 108:8 192:10 313:20 314:9 338:2, 3 343:5 377:10 412:19 414:18 415:5</p>
---	---	---

<p><b>legal</b> 10:15 11:15 17:24 29:2 50:7 53:22 54:2, 5 76:15 77:23 98:17 142:4, 5, 7 152:13, 13 154:18 184:17 186:16 244:8, 10, 13 245:3, 7 248:4, 5 281:22 283:18 288:13 294:19 326:24 327:2 330:16 373:6 423:17 <b>legalities</b> 25:2, 3, 11, 12 50:21, 24 <b>legally</b> 80:1 245:8 288:17 423:7 <b>legitimate</b> 76:16 196:18 <b>LEIGH</b> 2:21 <b>length</b> 142:3 <b>lengths</b> 238:10 <b>lesson</b> 313:11 348:20 403:13 404:7 <b>Letter</b> 4:9 110:1 141:19 169:4, 5, 7 176:16 199:13 225:9 227:15, 16 232:4, 6, 7 235:5 241:16, 20 249:8 261:4, 12 262:1 309:21 336:17 346:18 <b>letters</b> 199:14 <b>letting</b> 84:9 144:11 353:19 392:18 415:19 <b>Levy</b> 45:11 69:14, 15, 21 70:7 <b>Levy's</b> 45:15 <b>liability</b> 155:16 <b>liar</b> 137:7 333:4, 6 <b>Liberty</b> 2:8 <b>lie</b> 289:19, 20 291:5, 7, 8, 9, 15, 16, 17, 17 319:17 <b>lied</b> 289:22 291:4, 13 315:5, 7 319:4 <b>lies</b> 92:17 99:8 138:4, 7, 8 291:18, 18, 18, 19 292:3 <b>lieu</b> 427:9</p>	<p><b>life</b> 34:3 100:23 101:10 147:22 148:14 152:21 154:15 157:21 185:21 186:4 197:22 204:11, 12 237:14 285:10 307:16 348:21 <b>life,</b> 362:11, 14 <b>lifted</b> 90:3, 6 91:16 <b>lights</b> 286:3 <b>likes</b> 421:23 <b>Likewise</b> 269:5 <b>limit</b> 231:21 380:4 <b>limited</b> 363:15 380:13 <b>limiting</b> 367:18 <b>line</b> 158:20 188:23 189:22 286:10 433:3 <b>lines</b> 120:7, 11 175:1 235:7, 10 <b>linked</b> 299:6 <b>liquidated</b> 42:9 <b>LISA</b> 1:1 2:22 5:12 6:10 7:5 13:6 26:5 30:21 56:9 77:13 81:20, 23 82:12 83:19 84:18, 23 85:1, 4, 8 89:9 90:7 91:21 92:3, 11 94:21 95:5, 7, 7, 22 96:1, 4, 4 99:19, 23 100:3, 3 102:23 104:1 105:9 109:6 113:21 119:11 135:12 136:4 139:8, 20, 22 140:1, 6 143:21, 22 144:2, 4, 10 154:3, 24 162:22 163:4, 11, 13, 15, 17, 19 165:10 169:17 170:1, 2, 2, 12, 17, 18, 19, 24 171:16 173:5, 8, 20 176:18 177:6, 6, 22 181:14 182:23 186:7, 13, 18 193:3, 15 206:24 207:1, 18 208:6, 10, 11 215:5, 10, 20 218:15 222:15 227:17 228:16 240:8 242:23 254:15 260:5 262:1 264:14 267:20</p>	<p>268:3 272:4 279:7 280:4, 14, 23 282:5 285:3 298:14 305:4 308:8 312:2, 16, 20 316:17, 20 317:5 318:16 319:17 340:8 343:14 345:18 346:2, 19, 19 354:20 355:4 368:16, 24 371:10 373:4 374:3 393:7 401:1 420:4, 22 426:24 <b>Lisa's</b> 96:11 210:22 212:14 <b>list</b> 42:22 43:3 120:21 225:7 265:1, 7 266:3, 9, 16, 22 267:1 268:6, 7, 15, 19, 21 302:22 303:5, 10 363:6 <b>list,</b> 265:5 <b>listed</b> 16:12, 14 43:21, 22 50:10 51:3 63:2, 6 82:5 119:3 124:14 125:2 <b>listen</b> 32:19 67:7 71:5 87:18 126:2 185:13 208:19 260:13 275:12, 18 <b>listened</b> 150:24 210:20 236:22 275:14 277:1 <b>lists</b> 68:16, 17 <b>literally</b> 117:7 129:1 290:9 361:2 <b>little</b> 14:16 64:22 101:8 102:2 136:17 182:10, 11 254:3 260:24 265:4, 24 269:16 270:21 272:1 276:15 290:4 295:2 302:1 <b>live</b> 371:4 <b>lives</b> 77:18 97:6 100:19 130:7, 17 133:16 155:2 172:17 173:18 216:23 228:14 <b>load</b> 329:16</p>	<p><b>loaded</b> 330:1 334:11 351:12 <b>loading</b> 330:16, 18 <b>loathed</b> 175:5 <b>Lobitz</b> 109:16 <b>logic</b> 421:20 <b>long</b> 9:12 40:12 56:18 69:20 141:13, 17 144:24 172:14 195:4 221:8 223:4, 18 225:7 227:19, 20, 23 253:2, 8, 17 265:22 282:15 283:17 286:6 308:12, 15 358:4 <b>longer</b> 164:4 247:19 257:2, 2 362:17 <b>look</b> 11:16 17:10 25:3 28:5, 5, 6 38:20 40:2, 3 43:7 50:9, 15 51:6, 8 52:22 60:10 63:21 64:9 87:18 94:7 101:14 126:23 142:19 169:6 174:3, 11 210:22 211:12, 22 225:9 253:13 263:20 270:4, 21 292:4 306:16 321:9 323:21, 24 325:7 336:5 353:8, 22 362:9 365:7 368:15 370:19 371:8 374:20 379:10 387:18 390:10 393:3, 19 396:8, 21 397:22 401:24 417:14 <b>looked</b> 25:2, 10 34:12 39:19 134:24 202:19 210:23 231:8 242:15 297:20 306:10 308:9, 22 352:8 353:10 354:15 370:23 388:19 395:20 397:16 420:9 <b>looking</b> 14:6 57:8 133:15 141:7 164:8 192:10 207:7 252:24 267:2 270:19 272:19 284:6 314:16 324:4, 5 421:21</p>
--	---	---	---

<b>looks</b> 64:3 122:8 189:16 192:11 243:12, 18 345:10 365:20, 23 <b>lose</b> 232:8, 14 <b>lose-lose</b> 350:11 <b>losing</b> 182:18 <b>loss</b> 332:18 368:5, 7, 8 <b>lost</b> 201:16 232:10 251:2 308:20 380:15 <b>lot</b> 37:24 57:9 58:3 147:5 156:20 201:3 202:19 222:21 239:22 242:1 260:4 293:6 313:3 359:12 395:20 397:19 417:12 422:4 <b>lots</b> 36:18 142:3 170:23 231:16, 19 232:4 234:6 <b>loud</b> 60:17, 18 175:17 220:2 290:8 <b>louder</b> 255:5 265:4 <b>lousy</b> 385:1 <b>love</b> 280:22 <b>loving</b> 337:23 <b>loyalty</b> 272:9 273:24 274:4 <b>luck</b> 160:12, 16 <b>ludicrous</b> 74:17, 18 <b>LUKE</b> 2:18 5:16 316:5 415:4 <b>lunch</b> 180:13 191:17 <b>lure</b> 151:8 162:16 165:14 <b>lured</b> 150:12 212:16 <b>lures</b> 215:6 <b>lying</b> 193:24 292:2  <M> <b>machine</b> 431:6 <b>Macs</b> 409:16 <b>magic</b> 83:5 322:22 326:21 <b>magically</b> 159:7 <b>main</b> 211:14 <b>maintain</b> 117:17 121:23 127:14 181:9 212:21 368:19 380:19 <b>maintained</b> 117:13 255:8 285:21 380:13 <b>maintains</b> 67:23 118:8 328:16, 21 <b>major</b> 96:15 220:17 374:6 <b>maker</b> 328:7, 13 <b>make-work</b> 106:1 <b>making</b> 69:3 75:14 82:15 110:24 116:22 126:15 132:23 231:20 237:17, 24 238:8 250:22 295:23 309:16 314:2 342:2 350:21 392:12 397:6 <b>man</b> 36:22 184:9 189:5 278:21 313:22 315:8 <b>managed</b> 221:7 <b>management</b> 15:9, 11 29:2 194:10 223:22 224:23 225:1, 6, 14, 22, 23 226:11, 23 227:6 258:17 367:16, 20 368:12, 13 <b>manager</b> 105:16 209:18 220:1 222:20 225:16 227:7, 13 228:1, 12 <b>managing</b> 257:3 258:19 <b>Mandelés</b> 147:9 <b>manipulation</b> 222:20 <b>manipulative</b> 105:20, 22 107:23 128:1 194:7 198:13 <b>manner</b> 135:21 354:8 <b>manual</b> 118:10, 11 119:4 377:8 <b>manufactured</b> 97:3 <b>MARC</b> 2:22 26:1, 3 142:2, 4, 4, 7, 15, 17 143:6 186:15 189:17 244:17, 17 245:17 246:21 249:5 254:15, 22 263:21 264:6 346:2, 18, 19 417:12 <b>March</b> 13:11, 12 83:18 92:9 93:24 94:9, 16, 16, 17, 22 95:24 130:8, 9 132:1 163:24 168:16 169:9 171:7 181:23 182:1 198:3 229:20 241:10 251:19 252:10 254:1, 6, 7 264:4, 5 314:6 320:12 337:21 339:19 341:4 342:11 348:8 375:7 380:9 <b>mark</b> 121:9 242:12 381:9 <b>marked</b> 218:8 252:18 371:9 381:11 <b>Market</b> 1:13 2:3, 9, 14 <b>Marnie</b> 26:13 85:6, 7 91:3 95:2, 7, 23, 24 96:3, 6, 12 103:5, 9, 15, 21 109:6 113:21 119:8 135:23 136:24 137:6, 6, 8, 18 138:15, 17, 24 139:6, 9, 20, 22 140:5 143:9 144:1 150:6, 16 153:24 162:22, 24 164:20, 20 166:1, 2, 8, 9 168:6, 8 169:18, 24 170:12, 16 171:16 173:6 177:4, 21, 22 178:9 182:3, 23 208:11, 11 219:5 220:18 222:17 227:14 243:5 249:5, 17 250:19, 21 251:9 254:16 293:10 298:8, 16 301:22 302:7, 20 304:8, 11 305:13 307:4, 11 312:2 314:10, 16 319:24 335:8 340:8 343:6 353:24 356:15 363:3, 4 371:5 375:11, 23 377:2, 5, 16, 22, 22 378:6, 22 379:15, 17, 23 380:7 402:17 406:10 407:2, 3, 8, 22 408:12, 16 411:18, 19 413:4, 12, 17 417:2 419:17 421:12, 13, 22 428:3, 21, 21 429:13 <b>Marnie's</b> 96:13 136:4 138:16 228:14 362:12 419:11 <b>masse</b> 164:9 <b>Matt</b> 114:13, 14, 15, 17, 20, 22 115:3, 12, 20 116:5, 9 119:11 139:20, 22 140:4 162:21 193:14 222:19 227:14 254:20 298:8 304:3 308:10, 11, 15, 17, 18, 18 309:4 312:4, 16, 19 313:20, 21, 21 314:19, 22 315:1, 5, 7 337:2, 10, 13 338:1, 1, 2, 17, 18, 21, 21 339:3, 5, 6, 8, 8, 8 340:9 341:8 343:2, 3, 3 370:4, 21 371:1 375:15, 17, 19 408:15, 15 409:15, 19 413:5 414:3 417:7 418:5 420:3 428:4 <b>matter</b> 5:12 7:5 11:15 35:15 49:7 73:7 102:20 118:4 124:21 131:11 146:24 178:23 183:7 194:9 219:23 271:14 287:8 308:11 310:21 359:10 384:7 385:7 394:22 407:9, 14 408:4 <b>mattered</b> 287:9 <b>matters</b> 54:6 98:22 153:8, 9, 13 184:5 213:19 <b>Matthew</b> 104:3 <b>Matt's</b> 139:24 228:15 313:21 337:11 375:21 407:21 414:10 428:8 <b>McNulty</b> 26:11 92:4, 12 103:23 109:6 113:21 119:15 159:4 189:17 190:3, 12 192:17 218:11, 16
--



251:20, 21, 24 252:10  
 253:1 262:19 293:1,  
 6 298:9, 14 321:6  
 329:2 333:3 338:14  
 347:2 352:11 374:21  
 407:18, 20  
**McNulty's** 205:6  
 352:18  
**me,** 276:1, 7  
**mean** 12:24 13:4  
 14:20 16:7 17:3, 13,  
 22 20:12 25:5 27:1,  
 24 28:4 29:5, 6, 7  
 30:20 31:20 33:2, 23  
 34:1 39:1 42:21  
 43:4, 8 44:5, 9, 14, 15,  
 16 51:16 52:9 58:9  
 61:23 83:3 89:17  
 102:19 112:12 115:5  
 123:6, 9 128:19  
 131:12 135:18 140:3  
 147:5 151:6 152:4  
 170:5 173:3, 3 178:2  
 179:15 184:10 189:3  
 190:5 193:11 199:4  
 209:10 230:8 253:10  
 256:22 265:5 270:4  
 277:7 278:18 279:12,  
 18 317:18 332:18  
 336:3, 7 356:19  
 359:2, 9 364:16, 21  
 380:6 381:3 385:3  
 395:5, 8 397:5  
 401:13 408:3 422:14,  
 23 423:1, 5, 13 425:1  
 426:20, 22 427:2  
 428:22  
**means** 17:7 32:23  
 33:3 162:14 288:16,  
 19 336:8 378:7  
 423:6  
**meant** 148:23 149:1  
 183:22 227:17 233:6,  
 19 274:18 280:11  
 426:4  
**media** 136:14 267:8  
 268:11, 12, 13, 14, 15,  
 22 269:6 270:6  
 286:1 287:2, 10, 10

397:14, 23  
**mediate** 211:8  
**mediated** 134:12  
 136:10  
**medical** 232:15  
**medium** 413:23, 23  
**meet** 99:20  
**meeting** 85:3 90:23  
 93:24 130:23 132:1  
 211:23 229:24 230:2  
 243:21 244:1, 22  
 248:1 252:20 254:5,  
 6, 7, 14 264:5, 11  
 320:4 346:8 365:19  
**meetings** 125:18, 21,  
 22, 23 370:14 418:5  
**MEF** 2:22 51:1, 3, 8,  
 11 55:14 59:24  
 121:6, 7 122:4 215:6  
 230:15, 19 245:21  
 272:15 294:23 297:7  
 304:5 305:5 318:24  
 319:10 320:15  
 327:24 349:4 363:14  
 368:18 380:5 408:24  
 409:8  
**MEF,** 243:20  
**Mekelburg** 267:4, 23  
 268:1, 4, 8  
**member** 62:15 63:18  
 215:6 305:5  
**members** 16:5, 7  
 44:2, 5, 8 60:23, 23  
 126:4  
**memo** 95:2, 2 103:4,  
 9, 11, 13 139:23, 24  
 169:15 243:20 247:8  
 401:23, 24 402:1  
**Memorandum** 4:14  
 243:10, 11  
**memorialize** 124:23  
**memorialized** 125:4  
**memories** 239:22  
**memorize** 39:21  
 280:20 283:17  
**memorized** 282:16  
**memory** 63:17 135:3  
**men** 77:14 193:12,  
 13, 17

**mental** 137:15  
 140:11, 15, 19  
**mention** 168:19  
 361:21 407:12  
**MENTIONED** 3:10  
 4:3 204:23, 24 234:2  
 262:17 373:11 417:7  
 419:15  
**mentions** 362:5  
**Merville** 147:13, 20  
 149:6, 11, 15, 19  
 150:8, 12, 14, 23  
 152:5, 6, 16 153:18,  
 21 154:7 213:4, 10  
 298:15  
**mess** 313:5  
**message** 111:20  
 281:11  
**Messages** 4:18 112:1,  
 7, 14 113:8 173:20,  
 22 174:1, 4, 15, 18  
 210:23 211:4 280:13,  
 22, 23 281:3, 8 428:2,  
 2  
**messaging** 111:14  
**met** 147:23 260:22  
 339:14 390:19  
 397:11 398:2 400:18  
**metadata** 174:4, 7, 9  
**Meyer** 26:13 91:3  
 95:2 103:15, 21  
 109:6 119:8 143:10  
 150:7, 16 162:22, 24  
 166:1, 2, 8, 10 177:21,  
 22 178:10 190:3  
 251:9 298:16 301:22  
 302:7, 20 307:4  
 319:24 353:24  
 356:15 363:4 377:2,  
 22, 22 378:6 402:17  
 408:12, 16 411:18, 19  
 413:4, 12, 17 417:2  
 428:3  
**MIDDLE** 1:6 2:11  
 5:13 6:13 7:6 9:11,  
 13, 15 10:13, 14, 17  
 11:19 15:13, 17, 20  
 17:15 26:21, 23  
 27:17, 22 28:15, 21  
 30:4, 6, 24 31:6

32:20 34:5 37:10  
 38:4, 13, 23 39:11  
 43:18 44:3, 7, 18, 21  
 45:7 49:19 50:14, 20,  
 21 56:8, 9, 13, 14  
 57:1, 17 59:9, 20, 24  
 60:19 61:14, 18, 22  
 62:2, 6, 10 63:3, 11  
 64:9, 12, 18 66:18  
 67:5, 22 68:6, 13, 22,  
 24 69:7 70:14, 17  
 73:24 74:8, 24 75:7,  
 12 77:3, 7, 9, 22 79:2  
 84:20 85:13 89:10,  
 16, 23 93:3 95:15  
 109:13, 24 112:22  
 114:10, 12 117:17  
 118:7 120:24 128:20  
 130:11 131:15  
 133:14, 17, 21 134:7  
 152:19 155:13, 21, 23  
 156:7, 16, 18 157:14  
 159:1 162:12 184:4,  
 23 186:5, 9 195:10,  
 19 216:8 217:12  
 234:7 236:4 245:20  
 254:10, 12, 13 262:15  
 265:1 266:17 272:4,  
 11 285:21, 22 286:2,  
 7 287:18 288:10  
 289:1 290:17, 17, 23  
 296:18 297:18 306:4  
 327:3 328:9, 15, 20  
 365:18 371:16 373:5  
 374:11 376:4 377:13  
 393:5, 18 424:13, 22  
 426:3, 8 427:20  
**might've** 129:16  
 135:4 378:14 407:6  
**mild** 421:6  
**Miller** 109:16  
**Miller's** 108:17  
**million** 85:14 95:14,  
 20 97:22 98:5, 8, 23  
 99:1, 4, 15 159:4  
 160:7, 10, 16 177:18  
 217:21 239:11, 21, 24,  
 24 240:1, 3 260:3  
 340:23  
**millions** 98:7

<b>mind</b> 101:19 162:19 179:16 197:13 205:15 315:2 374:18 <b>minds</b> 172:14 233:24 <b>mine</b> 141:18 155:5 184:5 <b>minimizing</b> 220:4 <b>minimum</b> 252:22 <b>minor</b> 110:16 211:22 219:23 229:19 258:22, 24 259:2, 3, 11 310:24 <b>minute</b> 51:13 112:19 120:18 122:14 144:20 167:17 176:1, 7 191:8 230:10 240:13 292:17 321:9 347:23 427:5 <b>minutes</b> 23:2 145:1 152:4 160:22 212:6 236:14 344:10, 19 365:4 397:4 427:9 <b>mis</b> 295:7 301:19 <b>misappropriated</b> 280:5 <b>misappropriation</b> 272:13 <b>misbehaved</b> 303:8 <b>misbehavior</b> 304:17 305:11 306:18, 21 406:12 <b>miscategorization</b> 283:24 <b>mischaracterization</b> 22:22 82:7 177:2 179:23 215:15 404:23 <b>mischaracterized</b> 301:20 <b>mischaracterizing</b> 167:10, 11 311:12 <b>misconduct</b> 147:6 148:2 156:21 171:4 184:2 220:4 227:9, 10 303:16 337:6 368:10, 11 369:13 416:3, 5 <b>misconstrued</b> 371:15 <b>miserable</b> 341:11 <b>misread</b> 188:16	<b>misrepresentation</b> 272:14 <b>mistake</b> 73:9 155:8, 10 180:3, 7, 9, 17, 18 <b>mistakes</b> 160:21 231:7, 16, 19, 21 234:13 <b>misuse</b> 370:10 <b>mitigated</b> 152:23 157:1, 10 158:14 184:15, 19 185:2 209:22 <b>mix</b> 39:8, 9, 10 <b>mixed</b> 302:1 <b>Mm-hmm</b> 122:11 190:13 264:12 <b>MO</b> 185:17 <b>moan</b> 420:19 <b>moaning</b> 352:16, 19 369:19 370:1, 6, 11 <b>moans</b> 385:1 <b>moment</b> 57:2 120:17 162:9 247:3, 4 <b>money</b> 37:9, 17 38:13 39:11 40:6 43:18 110:24 160:24 161:6, 10 216:13 232:8 233:8 260:4 267:6 274:15, 24 275:3, 8 278:1, 5, 9, 13 279:4, 7, 13, 17, 20 280:5, 7, 10, 14 281:5 296:14, 17, 20, 24 297:1, 3, 7, 10, 13, 15, 16, 18, 21 366:3 370:9 376:11 377:24 378:6, 10 379:2, 3, 18 409:8 411:6 412:17 423:21 424:2, 10, 15 425:6, 7, 14, 17, 19, 19, 20 429:2 <b>mongering</b> 428:8, 19 <b>Month</b> 39:15, 17, 18, 20 260:23 342:12 420:13 <b>months</b> 38:1 91:5 94:23 131:8, 8 132:10 134:21 136:2, 6 157:23 164:5, 6 169:23, 23, 23 171:23,	24 172:1 173:15 182:5, 9, 12 197:14 252:23 259:7, 9, 10 362:8 399:19 400:4 401:14, 18 <b>morning</b> 56:4 103:10 173:7 177:5 192:13 <b>mother</b> 77:9, 22 133:15, 24 186:20 216:10, 11 <b>motion</b> 330:10 332:12 344:15, 24 415:20, 23 427:10 <b>mouth</b> 311:2 <b>mouths</b> 159:18 <b>move</b> 31:5 32:4 49:6 128:19 187:2 193:21 202:18 205:21 230:14 233:12 241:23 246:7, 22 247:1, 21 281:14 284:18 306:23 345:9, 12 418:8 <b>moved</b> 129:5 134:13, 13 187:9, 17 229:8, 14, 18 230:4 340:17, 18 <b>moving</b> 61:5 187:4, 8 223:8 <b>multiple</b> 295:24 369:5, 12 <b>murder</b> 307:15 308:24 309:2 <b>muted</b> 102:12 <b>mutual</b> 100:13  < N > <b>nail</b> 160:14 <b>name</b> 5:16 6:7, 11 9:7 10:15 27:13, 13, 14 28:2, 9 33:8 34:21 63:6, 15, 24 70:21, 22 80:12 100:24 108:17 111:6, 8 119:5, 13 127:18 298:18 299:9, 11, 20 300:17 301:5, 9 304:12, 19 306:15 388:2, 18 389:1	395:23 <b>named</b> 153:18 <b>names</b> 9:20 63:22, 23 123:20 126:13, 17 127:18 128:4, 8 265:7 266:3, 3 267:23 270:5 299:5 300:22, 24 303:11 398:5, 9, 10 <b>name's</b> 301:10 <b>narrative</b> 92:5 <b>Nasty</b> 111:22 113:10, 11, 12, 13, 15 230:23 231:5 342:24 <b>national</b> 162:16 <b>natural</b> 191:11 421:24 <b>naturally</b> 175:22 <b>nature</b> 129:18, 20 131:10 132:15, 18 194:6, 8 317:12 367:5 404:22 <b>NDA</b> 247:10, 11, 23, 24 248:15, 20 <b>NDA,</b> 247:9 <b>NDA's</b> 248:7 <b>necessarily</b> 317:18 <b>necessary</b> 50:18 432:5 <b>need</b> 5:23 19:22, 24 20:2 28:8 30:16 32:9 49:17 50:7 56:18 90:16 144:18 145:1 153:7 154:19 159:24 160:1, 7 185:11 189:8 233:10 241:4 248:4 263:7 315:14 332:17 383:21 427:6 <b>needed</b> 150:13 185:12 414:21 <b>needs</b> 56:16 58:1 59:12 222:6 358:4, 5 359:8 422:12 <b>Neither</b> 152:15 431:9 <b>nest</b> 342:15, 23 <b>net</b> 41:9 42:14, 20 <b>never</b> 16:1, 9 20:24 65:7 66:6 81:1, 3, 5 94:3 97:14, 14 108:8
---	--	--	--

115:12 116:18 137:17 147:22 188:1 189:2 198:7 199:11 203:19, 22 205:6, 17 206:1, 14 213:7, 8, 11, 11, 12 228:8 229:18, 21 231:11, 12 240:2 247:10 263:7 266:10 277:1 279:6 280:7 281:11 289:9, 11 306:9 309:8 334:17 349:3 350:4 402:18 418:18, 19 419:6 420:16 424:2 <b>new</b> 32:6, 16 60:21 62:9 100:14 117:3 130:14 158:20 189:11 247:9 248:19 249:8 336:22 342:12 343:14 354:23, 24, 24 393:12 400:3 407:2 <b>news</b> 392:22 406:10 <b>newspapers</b> 269:12 <b>nice</b> 35:12 160:10 <b>night</b> 77:16 304:4 313:11 <b>nine</b> 98:6, 6, 6 298:20 <b>no</b> , 95:8 170:2 <b>Nobody's</b> 278:9 <b>nods</b> 8:1 <b>noises</b> 110:24 <b>noncommittal</b> 126:8 <b>Nonprofit</b> 11:5, 6 12:1, 2 267:2 <b>nonprofits</b> 38:22 267:19 <b>nonresponsive</b> 18:3 29:20 56:11 73:20 332:14 <b>nonresponsiveness</b> 359:16 <b>nonsense</b> 18:12 <b>non-tax-deductible</b> 425:20 <b>Nope</b> 323:10 <b>normal</b> 36:3 182:13 321:24 <b>Notary</b> 1:16 431:2, 15 434:21	<b>note</b> 6:14 54:8 58:14 127:15 170:14, 15 178:10, 14, 19 198:11 211:13 219:17 256:17 309:13 343:9 350:3 373:18 374:16 417:6 <b>noted</b> 5:20 200:24 213:1 432:11 434:8 <b>notes</b> 125:8, 11, 17, 21 126:22 199:6 209:18 211:23 <b>Notice</b> 1:12 431:4 <b>notify</b> 44:2 <b>noting</b> 94:19 <b>November</b> 1:6 5:9 89:11, 16, 24 91:4 92:7 93:19 94:1, 3, 14, 15, 18 95:3, 23, 24 96:4 102:18 103:4, 10 108:1 119:17 122:9 125:3 129:12, 12 130:8 131:7, 9, 16 132:10 134:10 135:20 141:8, 19 148:12 150:9 153:21 156:23 159:8 163:22 168:18 169:3, 15, 21 170:15, 16, 22 171:8, 14 172:7, 24 173:7 176:18 177:6, 21 181:22 187:20, 21 189:20, 21 190:7 191:4 197:12 198:20, 21 202:16, 18 208:4 211:24 228:3, 4 229:24 230:2 231:9, 17 233:24 234:2 235:12, 13, 22 241:20 243:19, 22 248:1 249:11 256:3 257:1 292:12, 20 306:13 313:3 314:1, 4, 4 320:4, 8, 11 321:12 333:13, 13, 14, 24 336:23 337:6, 20 339:23 340:16 341:4 342:7, 9 343:14, 15 344:1 347:17 348:8 349:13 350:23	354:14, 18, 21 355:13, 19 362:8 364:4, 9 365:7, 16, 19 367:14 370:9 374:23 377:4, 5 380:1 384:6, 8 385:8, 10 406:4, 7 421:5 431:11 <b>now</b> , 419:9 <b>NUMBER</b> 3:10 4:3 38:8 42:10 60:23 64:22 65:3 98:22 99:3 115:22 117:4, 6 152:3 242:3, 4 291:20 293:4 300:5 321:5 336:20 373:4 380:1 <b>numbers</b> 38:2 39:21 98:18 164:11 172:3 182:19, 22 183:4 266:4 270:5  < O > <b>oath</b> 9:3 207:18 222:7 398:24 <b>Object</b> 10:21 13:17 14:3 16:16 17:2, 17 18:6 22:12 24:12 26:17 33:14, 20 37:23 38:15 40:19 61:24 65:22 66:20 67:24 71:2, 15 74:11 75:1 78:1 79:4 80:17 81:2 82:4 86:8, 9 87:24 89:12 90:9 91:22 93:7 103:1 105:11 107:4 108:13 111:16 116:12 123:21 125:6 128:9 129:24 131:5 132:19 133:13 134:2, 2, 6 137:2 140:16, 16 141:4 144:7 146:1, 7, 15 147:2, 15 148:5 149:7, 16 150:3 151:2, 11, 17 152:7 153:15, 23 154:9, 17, 17 155:18 156:5, 12 157:16 158:9 161:5, 12, 20 164:23 165:9, 19 166:4 170:6	171:5 179:22, 22 181:2, 21 185:10, 19 186:1 202:9 207:9, 20 208:14 210:9 212:23 214:4, 20, 20 215:14, 14 217:5 218:23 220:7 228:10 229:4 230:17 231:3 233:21 234:21, 21 235:11 236:6, 19, 19, 20 237:7, 19, 19 238:23 241:17 244:5, 13 246:2 253:5 255:10, 10, 18 256:5 257:8 258:12 259:14 260:7 262:22 263:1, 16, 19 266:13 268:23, 24 269:14 270:7 273:4, 10 275:10 276:2, 20 277:20 278:2, 11 279:9, 24 280:8 281:16 282:7 283:2, 23, 23 284:10 285:5 286:24 287:21 290:19 291:22 293:23 294:9, 10 295:6, 6, 12, 12, 19 296:1, 2, 4, 22 297:4, 9 298:5, 24 299:1, 1, 2 303:6, 18, 18 304:21 306:1 307:21 310:4 311:11 314:20 317:10 319:2 322:13, 20, 24 326:23, 23 329:6 333:20 334:1, 10, 19 337:16 342:5 346:17 348:11 354:2 355:24, 24 360:24 362:21 364:10 366:23, 23 367:4, 13 369:8, 14, 20 371:23 372:15 374:14 378:8 384:13 403:6 404:21, 22, 23 406:21 411:8 413:13 416:13 422:21 423:3 426:9 <b>objecting</b> 166:18 353:11 359:15 402:13 404:24 405:1, 2
--	---	---	---

**objection** 17:5 20:16, 22 35:10 65:9, 17  
66:8 73:14 76:8, 23  
78:6, 12 82:15 89:19  
130:21 146:21  
167:16 177:1 196:4  
205:19 206:6 235:4  
238:3 284:16 327:9  
329:23 347:24  
364:14 386:22  
398:13 404:3, 11  
**objections** 5:4 18:12  
76:13 84:5 87:5  
239:4 294:15 416:18  
**objection's** 213:1  
**observe** 416:9  
**Obviously** 182:8  
359:14 362:4 381:23  
**occasions** 29:4 314:3  
**occurred** 241:9  
243:22 330:18  
**O'CONNOR** 2:6, 21  
6:13  
**October** 260:22, 22  
261:3  
**odd** 204:6  
**offer** 99:13 126:8  
168:17 169:10  
**offered** 127:14 182:4  
199:10 275:8  
**offers** 182:24  
**office** 29:2 89:18  
90:1, 15 92:5 103:5,  
19 107:8, 18 115:3  
119:18, 24 120:1  
126:6, 9 128:2, 21, 21  
129:1 136:12 141:17  
143:3 148:16 157:19  
193:2 232:21 233:7  
234:8 243:12 249:22  
250:4 251:12 253:14  
254:8, 9, 10, 12, 13, 24  
257:2, 3 258:17  
312:11 313:19  
317:19, 20, 22 336:24  
337:19 338:2, 4  
339:23 347:6, 11, 16,  
18 363:15 367:11, 18  
374:24 380:6, 7, 13  
428:14

**officer** 62:21 155:13, 20  
**officers** 16:8 45:4, 8  
63:22 64:10, 15  
66:19 67:23 68:9  
**Officers,** 67:16, 18  
**offices** 67:22 105:6, 7  
**official** 317:6, 13, 15,  
17 318:1, 17 431:11  
**Oh** 85:19 90:21  
97:1 121:12 142:7  
159:6, 7, 9 169:24  
171:17 177:17  
193:24 236:6 267:20  
275:16 303:10  
340:20 343:9 426:19  
429:15  
**Okay** 6:16 7:12 8:5,  
9, 14, 24 10:19 12:2  
14:15, 18 21:23  
24:23 27:22 31:23  
32:12, 14 33:7, 18  
34:14 36:10 37:22  
39:5, 20 40:3 41:5,  
24 43:5 48:9 51:11  
53:21 56:24 57:16  
58:17 60:15 65:19  
68:21 72:20 73:20  
85:15 87:17 88:6  
90:17 99:18 100:14,  
22 101:13 102:1, 15  
104:22 114:24  
120:19 121:21  
122:12, 17, 17, 17, 20,  
22, 22, 22 137:14  
138:19 143:1 148:21  
151:21 171:11  
175:24 176:2, 9, 9  
178:22 182:16  
183:19 191:10, 22  
198:10 204:9, 19, 20  
219:14 221:4, 5  
225:18 241:23 243:2,  
5 247:2 252:4, 8, 17  
253:16, 19 254:13, 19,  
23 258:6 259:20  
260:21 262:20  
263:13 264:8, 17  
267:15 272:24 274:2  
276:10 281:10, 13

288:12 290:16  
292:18, 18 293:3, 6  
294:20 321:10, 16  
324:22 328:9 329:1  
330:10 333:22 334:4  
335:12 341:12  
343:19 344:17 345:3  
346:16 347:20  
350:18 352:8, 21  
353:18 354:12 360:4,  
20 361:9, 14 362:9  
363:23 365:2 368:15  
373:13, 16, 17 377:16  
379:11 380:9 384:10  
385:11 389:10, 16  
394:4 397:15, 24  
400:16 401:6, 7  
413:11 415:3 416:23  
417:2 419:15 420:16  
421:13 426:1, 19  
428:11  
**old** 304:12 313:9, 16,  
17, 17 354:23 355:1,  
1 369:21, 24  
**omitting** 83:19  
**omniscience** 114:8  
**omniscient** 114:4  
**once** 43:1 130:16  
231:12, 12 252:21  
261:23  
**one-on-one** 103:6  
105:6  
**ones** 89:2 232:5  
399:18, 21 424:19  
**one's** 116:2 120:6  
**one-syllable** 360:10  
**one-to-one** 143:6  
**ongoing** 336:24 337:3  
**online** 62:23  
**open** 12:20 21:6, 8  
117:6 216:18 259:16  
370:16, 16, 17 424:5, 5  
**open-ended** 226:8, 9  
**opening** 12:8, 13  
13:23 14:2 426:2  
**operations** 304:6  
368:22  
**opinion** 245:19

**opportunity** 43:15  
56:21 88:11, 14, 17  
130:1, 6 349:8  
**opposing** 54:7  
**opposite** 132:7  
**order** 6:1 22:5, 9, 14,  
18, 22 23:4, 8, 8, 12  
36:22 121:13, 23  
138:18 141:22 142:1  
161:2 162:17 201:14  
232:10 295:22  
326:21 327:6, 6  
377:6  
**orders** 23:9, 16  
336:10  
**Ordinance** 42:2  
273:23  
**ordinary** 126:9  
**organization** 10:4, 11,  
20 11:1 14:7 15:12,  
20 16:10, 12 21:10  
32:23 46:9 64:7  
93:13 134:8, 9  
184:24 186:21, 22, 23  
187:1 267:8 341:13  
342:3, 7 343:5 423:7  
**organizationally** 423:8  
**organizations** 11:7  
15:24 20:15 346:4  
**organize** 417:14  
**Original** 381:23  
432:14  
**originally** 86:21  
**other's** 62:9 182:23  
337:22  
**otherwise,** 313:12  
**outcome** 252:20  
431:9  
**outline** 332:21  
**outlining** 220:5  
**out-of-office** 119:19  
**outrageous** 386:17  
**outs** 425:12  
**Outside** 120:1 128:2  
152:3 374:7  
**over'** 276:16  
**oversee** 216:14 379:2  
**oversight** 340:3  
368:22  
**owe** 78:3



**owed** 141:2 412:5  
 414:11  
  
**<P>**  
**P.C** 2:13  
**p.m** 102:8 145:15, 15,  
 18 189:21, 24 192:1,  
 4, 4, 6 316:11, 11, 13  
 426:12 429:19 430:1  
**PA** 2:4, 9, 15  
**packed** 251:14  
**PAGE** 3:4, 10 4:3  
 60:2, 4, 10, 11, 12  
 63:2, 7, 9, 20, 21 65:3  
 265:23 433:3  
**pages** 30:21 52:24  
 56:18 103:14 242:7  
 357:22 434:4  
**paid** 26:16, 23 27:2,  
 2, 3, 5 37:10 38:4, 6,  
 7 76:17 79:24  
 150:17 160:20, 20, 21  
 161:16 162:2, 3  
 237:2 272:16 286:17  
 287:4, 5, 8 296:15, 17,  
 20 297:3 376:21  
 409:22, 24 410:4, 14,  
 20 411:11 412:3, 6,  
 19, 24, 24 413:1  
**panoply** 259:4  
**paper** 288:21  
**paperwork** 50:16, 16  
**paragraph** 87:6, 7  
 118:20 230:11  
**parameters** 252:22  
 253:3, 8, 17, 20 334:4  
**paraphrased** 177:6  
**part** 14:7 17:10  
 94:18 106:11 108:24  
 114:20 118:6, 21  
 119:4 132:22 136:3,  
 19 141:15 154:4  
 187:8 213:20 243:9  
 249:17 257:14  
 260:18 271:22 272:2  
 287:2, 10 298:2  
 319:14 328:1 339:21  
 340:4 342:24 343:3,  
 3 350:6 366:6  
  
 375:21, 21 381:18  
 421:1  
**partially** 92:8 380:12  
**participant** 13:3  
**participate** 240:10  
**particular** 94:21  
 131:24 135:22  
 308:21 380:5 390:11  
**particularized** 157:13  
**particularly** 92:11  
 116:5 119:23 132:13  
 141:10 186:15  
 380:11  
**parties** 5:2 6:2 302:1  
**parts** 348:24  
**party** 291:16 431:9  
**pass** 261:13  
**passed** 261:5  
**passwords** 243:7  
**pasted** 190:2  
**patently** 58:9  
**path** 388:6  
**patience** 37:7  
**Patricia** 26:10  
 103:23 109:5 113:21  
 119:14 192:17  
 207:19 218:11  
 254:15 298:13 321:6  
 338:14 352:11, 18  
**Patricia's** 212:19  
 308:6  
**pattern** 310:3, 8, 9  
**pay** 24:10 150:16  
 161:7, 19 217:7  
 240:1 275:8 333:4  
 377:18 410:13, 22, 24  
 411:3, 5, 10 412:12,  
 21 413:3 414:17  
**payday** 160:10  
**paying** 160:13, 18  
 368:3, 3 379:15  
**payment** 278:13  
**payments** 161:22  
 379:8  
**pending** 49:3 224:9  
 246:13 315:14, 15, 18  
 324:16, 19, 21 325:12,  
 16 326:2, 7, 9, 12, 19  
 332:3, 10 335:15  
 341:23 343:11  
  
 394:16, 18 396:7  
 426:6  
**penis** 71:1, 13 73:24  
 74:9 116:10 152:1  
**PENNSYLVANIA**  
 1:1, 13, 17 5:15  
**people** 45:3, 13 54:8  
 79:17 96:10 104:20,  
 21 113:19 115:10  
 116:24 119:9 125:2  
 127:17 128:4, 17  
 136:24 139:17  
 142:21, 24 155:4  
 180:4, 10, 22 181:7,  
 12 184:1 204:8, 9  
 215:24 216:15  
 217:20 236:17  
 249:13 255:8 292:2  
 295:24 299:9 301:16  
 313:4 326:21 342:17  
 343:1 387:24 390:19  
 397:11, 16 398:2, 16  
 399:24 400:6 401:3,  
 5 418:16, 19 423:20  
**people's** 133:16  
 229:2 239:22 268:16  
 274:14  
**percent** 160:8 380:18  
 382:16 389:18 390:9  
 399:23 400:5 402:2  
 404:8  
**perfect** 187:3 340:21  
**perfectly** 160:6  
 182:13 315:20  
**perform** 382:5  
**period** 14:21 93:5  
 131:20, 21 252:23  
 253:21 348:9  
**perks** 231:22 232:2  
 234:12  
**permission** 232:21  
 285:3, 9 287:13, 15,  
 16, 19 289:5 346:14,  
 23, 24 374:4 413:5  
**permitted** 58:12  
 101:7 256:21 376:5,  
 10 377:23 409:19, 21  
**person** 8:18, 19  
 34:15, 16 35:1, 3, 8  
 76:17 105:5, 6 115:1,  
  
 6 126:1, 3 127:20  
 152:20 154:14  
 171:24 183:3 217:4  
 219:9 248:12 295:3,  
 11, 23 313:6 336:13  
 341:11 375:12 385:2  
 388:2 413:24 419:18  
**personal** 41:9 42:20  
 77:18 118:19 135:19  
 143:5 148:13 155:1  
 171:12 180:9 218:22  
 219:2 237:14 251:13  
 304:15 309:9, 10  
**personalities** 184:16  
**personality** 135:15  
 198:12 419:20 420:2  
**Personally** 40:23  
 134:24 249:20 380:8  
 397:10  
**personnel** 118:10, 11  
 225:11 258:17 377:8  
**persons** 60:22, 22  
**pertained** 213:9  
**pertinent** 15:3 24:1  
 47:7 157:7 197:8  
 201:20 278:24 313:1  
**perverted** 162:19  
**Philadelphia** 1:13  
 2:4, 9, 15 42:2 60:20  
 273:22 317:6  
**Philly** 62:9  
**phone** 18:10 54:24  
 80:5, 16 105:5 126:3  
 142:19 210:24 236:2  
 266:3 270:5 304:3  
 337:2 338:20 339:3  
 392:12  
**phonetic** 104:13  
 109:16 110:2 147:14  
 346:8  
**photograph** 178:20  
**photographs** 158:19  
 287:1  
**photos** 107:11  
**PHRA** 41:23 42:9  
**phrase** 25:9  
**physical** 157:20  
 249:24  
**physically** 89:17

<p>250:4, 22 251:4  <b>pick</b> 80:5 236:2  <b>picks</b> 77:14  <b>picture</b> 258:23 288:8, 21 289:1, 4, 12 290:10  <b>pictures</b> 287:12  <b>piling</b> 120:7  <b>pillow</b> 174:24  <b>pin</b> 102:22  <b>PIPES</b> 1:11 3:3  5:12 6:6, 21 7:4, 6  9:9, 10 14:11 19:9, 14 21:18 22:6, 10, 17  23:9, 10 26:8 30:6  31:1, 10 32:6, 21  35:20 41:9 45:21  49:16 53:6 59:19  67:17 69:24 71:6  72:4, 11 74:20 76:4  79:6 81:9 83:21  84:18 86:2 115:15  118:18 121:13 122:7  145:21 159:13 166:7  175:23 187:6 188:15  189:7, 10 195:10  196:17 197:21 200:7  201:15 203:5 204:2, 14 212:10 215:20  216:7 217:13 218:7  220:3, 20 221:20  222:24 223:20 224:2  225:18, 20 230:20  233:9 236:18 240:1  243:16 244:7 245:15  247:21 257:5 270:9  271:3, 15 272:21  277:8 278:19 279:6  288:15 290:6 291:20  296:12 300:13, 21  304:18 307:10 311:6  315:10 316:17  324:14, 21 325:2  326:17, 19, 20 327:12, 22 331:12 332:2, 10  333:7 335:12 336:19  341:23 343:16, 19  345:14, 19 346:6, 13  351:8 352:24 356:13  358:22 359:18 362:7, 24 363:4, 8 374:18</p>	<p>376:15 379:24 387:1, 20 390:24 391:17  394:12 399:19, 23  400:11, 11 401:23  403:17 404:16  405:24 412:2, 2  414:8 417:3 424:3  428:5 429:14  <b>Pipes-1</b> 3:11 120:22, 23  <b>Pipes-10</b> 3:20  <b>Pipes-11</b> 3:21  <b>Pipes-12</b> 3:22  <b>Pipes-13</b> 3:23  <b>Pipes-14</b> 3:24  <b>Pipes-15</b> 4:4  <b>Pipes-16</b> 4:5  <b>Pipes-17</b> 4:6  <b>Pipes-18</b> 4:7  <b>Pipes-19</b> 4:8  <b>Pipes-2</b> 3:12 121:5 122:4  <b>Pipes-20</b> 4:9  <b>Pipes-21</b> 4:10  <b>Pipes-22</b> 4:11  <b>Pipes-23</b> 4:12  <b>Pipes-24</b> 4:13  <b>Pipes-25</b> 4:14  <b>Pipes-26</b> 4:15  <b>Pipes-27</b> 4:16  <b>Pipes-28</b> 4:17  <b>Pipes-29</b> 4:18  <b>Pipes-3</b> 3:13 121:14, 16  <b>Pipes-4</b> 3:14 121:18, 20  <b>Pipes-5</b> 3:15  <b>Pipes-6</b> 3:16  <b>Pipes-7</b> 3:17 242:7  <b>Pipes-8</b> 3:18 242:6, 12  <b>Pipes-9</b> 3:19  <b>Place</b> 2:8 5:24  44:12 79:10 80:1  93:5, 6, 10 105:5  137:3 140:3 169:10  172:5 211:5 238:12  245:6 252:22 253:3, 8, 17 286:4 309:9, 12  314:14 334:5 344:1</p>	<p>355:15 370:24  380:15 431:5  <b>Plaintiff</b> 1:4 2:6, 22  6:9 98:4, 10  <b>plaintiffs</b> 95:19  96:20 97:7 98:20  109:22 114:21  153:17  <b>plan</b> 375:10  <b>planning</b> 16:18, 21, 22 18:22  <b>plate</b> 417:12  <b>play</b> 75:19  <b>played</b> 75:23 121:11 275:21 276:12  <b>playing</b> 55:14 139:13, 16, 20 140:7, 9 417:10  <b>plea</b> 165:5  <b>pleasantries</b> 304:5  <b>please</b> 5:22 6:6 8:20  9:7, 20 14:24 18:11  32:16 48:13 60:17  68:15 84:4 87:17  88:6 105:9 115:15  120:17, 18 125:24  175:20 177:20 196:8  226:5 243:16 257:14  260:18, 24 265:4  281:7, 8 300:13  344:12 346:12  373:13 398:19 410:9  427:22 432:4, 8  <b>pleased</b> 239:7, 8, 9  403:12  <b>plenty</b> 85:19 169:6  <b>PNC</b> 40:10  <b>poetic</b> 315:16 335:19  <b>point</b> 13:8 28:19  48:22 78:17 79:19  84:24 90:3 93:23  94:2 99:1, 19 143:15  150:2 153:17 158:6  160:19 189:8 191:12  193:13 194:4 198:11  211:13 224:17 229:6  242:3 286:8 298:21  300:21 304:18, 19  309:6 312:10 321:22  350:19, 21, 23 359:9  374:23 378:4 381:13</p>	<p>382:20, 22 418:22  419:22  <b>point-blank</b> 95:6  <b>pointed</b> 163:21  182:22 206:3  <b>pointedly</b> 126:6  <b>pointing</b> 124:7  190:13 226:15  319:22  <b>points</b> 226:15 254:2, 4  <b>policy</b> 116:23 117:13, 18 118:7, 9, 21  232:17, 20 245:21, 22  255:8 259:11 285:20, 24 294:23 298:2  327:24 328:21  367:10  <b>political</b> 12:3, 7  317:8, 13, 16, 18, 23  346:5 371:16 423:22  <b>politically</b> 424:8  <b>politics</b> 11:18 13:15, 24 126:9 286:1, 6  424:16  <b>pool</b> 340:2  <b>poor</b> 110:4  <b>pop</b> 134:17, 21  371:19 372:1, 4, 9, 10  <b>portfolio</b> 40:15 44:3, 4  <b>portray</b> 286:2  <b>portrayed</b> 261:22  262:4 287:9  <b>Posepiak</b> 346:8  <b>position</b> 28:14 45:15, 17, 21, 22 68:18, 24  69:11 79:1 84:19  111:2 140:7 183:13, 15, 17 212:17 236:3  240:17 333:1 334:7, 8, 13, 18, 21 339:11  349:1 350:10 368:22, 24 375:11 387:3  <b>positioned</b> 69:6, 9, 15  <b>positions</b> 269:5  <b>positive</b> 169:15  <b>possession</b> 54:19  112:10 300:22</p>
---	--	---	--

304:19	328:9 377:9, 10	158:14 160:22	19 124:2 126:5
<b>possibility</b> 258:21	<b>press</b> 75:7	163:20, 24 171:17	230:9 421:1
<b>possible</b> 171:7, 13	<b>Presumably</b> 112:5	172:17 184:23 187:2,	<b>projects</b> 120:8
182:7 334:6 371:13	261:5, 13 422:8	4, 8 211:15 216:24	136:13 265:2 368:19
<b>possibly</b> 299:6	<b>pretend</b> 55:12 64:14	217:8, 18 229:21	420:22 422:5
<b>Post</b> 235:12, 13	214:13	253:14 266:11	<b>prominent</b> 287:10
249:11 354:21 377:4	<b>pretended</b> 289:22	271:15 288:7 314:23	<b>promise</b> 8:21, 22
<b>pot</b> 425:7	291:15	395:18 403:17 405:5,	<b>promptly</b> 255:20
<b>potential</b> 24:24 425:5	<b>pretty</b> 23:12 41:15	9 418:24 428:18, 23	<b>propositions</b> 75:15
<b>potentially</b> 303:22	404:16, 16	<b>problem,</b> 100:9	<b>propounded</b> 434:6
312:7	<b>prevent</b> 117:18 118:8	<b>problems</b> 15:9 86:24	<b>Prosser</b> 104:9 233:18
<b>power</b> 181:1 339:11	<b>previous</b> 324:6, 8	97:5 117:8, 10, 11	<b>protect</b> 78:11, 16
348:23, 24 349:1	355:15 380:20	119:1, 20 130:24	234:10 238:12 342:3
<b>powers</b> 234:12	<b>previously</b> 182:23	132:9 135:9 158:22	<b>protected</b> 157:15, 21
<b>Practice</b> 42:2 273:22	346:6	162:4 185:1 198:4	<b>protection</b> 157:22
401:20	<b>principals</b> 187:12	211:8 216:16, 18	<b>protest</b> 213:24
<b>pre</b> 354:21, 22 362:8	234:19 239:8	225:10 229:12 233:7	<b>protested</b> 186:12
364:4 377:4 406:7	<b>printout</b> 261:4	329:17 367:22	<b>protocol</b> 178:1
<b>pre-authorized</b>	<b>prior</b> 47:16 49:13	370:17 421:6	<b>protocols</b> 178:6
376:12, 16	131:9 224:5, 16	<b>Procedure</b> 98:13	<b>prove</b> 314:4 333:6
<b>precedence</b> 422:1	324:3 344:8 406:4	377:21 378:3	<b>proven</b> 137:7 333:3
<b>precise</b> 70:9	<b>priority</b> 238:13	<b>proceed</b> 19:17 22:2	<b>provide</b> 7:21, 24
<b>precisely</b> 105:17	<b>private</b> 133:16	201:13	28:24, 24 32:16, 23
<b>Predated</b> 343:15	185:21 186:4 215:24	<b>proceeded</b> 13:8	127:18 199:11
<b>predator</b> 202:8	216:23	<b>proceeding</b> 37:3	261:12 277:10 283:4,
<b>pre-March</b> 348:3	<b>privilege</b> 65:17 74:15	102:8 145:15 192:4	8, 10 398:5
<b>preparation</b> 418:8	244:8, 10, 24 245:3, 7	316:11	<b>provided</b> 7:20 88:19
<b>prepared</b> 271:11, 14	246:17 248:6 381:6	<b>process</b> 96:24 119:4,	279:22
285:2 418:9	402:14, 16 404:3, 12	6 152:13, 13 340:4	<b>providence</b> 79:16
<b>Preparing</b> 350:17, 18	405:16, 18, 19	<b>produce</b> 113:5	237:2
369:22	<b>privileged</b> 113:4	177:20 280:21 281:9	<b>provides</b> 48:19
<b>presence</b> 157:20	245:8 268:19 405:12	373:14 402:19	<b>providing</b> 352:22
374:7	<b>privileged,</b> 65:15	<b>produced</b> 159:17	<b>proxy</b> 155:16
<b>PRESENT</b> 2:18	<b>privileges</b> 250:3	252:18 381:7 399:11	<b>psychological</b> 184:17
25:19 328:4 356:17,	<b>pro</b> 149:11, 14, 15	402:12, 19 428:2	185:7, 8 337:1, 3
20, 24 357:4, 10, 10	215:12	<b>producing</b> 65:19	<b>psychology</b> 184:22
358:18, 20, 23 359:5	<b>probably</b> 7:12, 13	398:11	<b>Public</b> 1:16 50:16
360:20 361:2, 6, 13	23:15 70:15 77:12,	<b>product</b> 362:18	268:21 270:5 318:1,
<b>presented</b> 217:18	16	<b>production</b> 66:3, 14	17 369:2 431:4, 15
<b>presenting</b> 55:6	<b>probation</b> 94:6 231:6,	67:1 112:13 125:20	434:21
<b>presently</b> 110:8	11 369:3	368:21 373:23	<b>publication</b> 269:7
<b>presents</b> 86:3	<b>probationary</b> 252:23	<b>Professional</b> 1:15	<b>public-elected</b> 317:12
<b>preservation</b> 405:16	253:21 368:23 369:1,	<b>profile</b> 424:12	<b>publicly</b> 287:17
<b>President</b> 28:16 33:4	4, 11	<b>profit</b> 161:3	<b>pull</b> 87:6 120:18
45:23 46:4, 6, 8	<b>problem</b> 23:18 35:23	<b>Profusely</b> 397:23	207:19
47:20 49:18 50:1	41:7 55:22 58:23	<b>prohibit</b> 327:24	<b>pulled</b> 193:3, 15
56:14 67:21, 21 69:3,	91:18 93:10 96:1, 11	328:21	201:6, 9 203:19
4 77:2, 7 114:4	97:6 99:24 100:4, 13	<b>prohibiting</b> 294:23	204:15 205:4 206:9
119:5 195:10 216:8	129:8 134:10, 18	<b>project</b> 119:21	<b>pulling</b> 204:23
	135:10 149:20	120:12, 16 123:2, 7,	

**pulls** 204:18  
**punished** 233:3  
**punitive** 40:22 41:8, 10, 12, 13, 17, 19, 24 42:3  
**purchased** 409:7, 8  
**purple** 421:12, 14  
**purpose** 274:18, 23  
**purposes** 280:11 339:15  
**pursuant** 1:12 431:4  
**pursue** 90:22, 24  
**purveying** 315:3  
**purview** 74:23 75:4, 12  
**push** 140:1 338:12  
**put** 51:9 52:11 57:23 65:3 83:14 84:5 97:2 106:19, 22, 22 137:9 150:19 152:21 159:18 176:3 178:14 183:12, 15, 19 193:2, 14, 21 195:20 198:14 199:20 201:5 206:10 211:22 212:18 213:19 229:11 231:6 261:23 268:18 311:2 340:1 345:7 385:24 403:5  
**puts** 205:14  
**putting** 55:21 171:1 205:1

## &lt; Q &gt;

**question** 5:5 7:18 8:10, 10, 11, 22 14:22, 24 18:3, 21 19:4, 8, 15 20:6, 8, 10, 21 21:20 23:3, 7, 17, 20, 22 40:24 44:17, 18 46:23 48:18, 22 49:2, 4, 6 51:16, 24 53:9 59:9, 21 61:4 66:22 68:1 72:24 82:20 86:10 91:13 100:24 101:11, 17 107:5 109:21 133:10 146:4 151:17 154:10 155:15 156:15 162:8 166:12 168:5 171:6

172:11 177:7 179:8 184:11 188:4 194:22, 24 195:8, 11, 23 197:2, 5 203:4, 9, 10 210:16 212:3 220:23 222:2, 9, 11, 24 223:6, 7, 12, 13 224:2, 8, 9, 14, 16, 17, 18 225:22 226:1, 10, 14, 18 244:14 246:4, 13 248:3, 5, 14 249:15 257:4, 12 258:3, 4, 7, 13 264:1 278:21 279:3 283:9, 15 284:1, 17 295:14, 20 297:17 299:8, 21 302:2 311:7, 8, 15, 17, 18, 18, 19 315:11, 13, 15, 18 318:10, 18, 19 324:9, 16, 19, 21 325:2, 11, 12, 13, 16, 20 326:1, 2, 4, 7, 9, 10, 12, 12, 15, 19 327:13 329:13, 17 330:1, 1, 13, 23 331:1, 2, 4, 7, 14, 22 332:2, 10 333:11 334:11 335:15, 17 336:1, 2 341:17, 22 342:1 343:11 344:13 351:4, 7, 8, 13, 14, 20 352:1 353:4, 7 356:12, 23 357:3, 4, 9, 9, 12, 16, 18, 19 358:18, 19 359:4, 7, 23 360:2, 4, 6 362:7 367:5 374:19 378:21 386:14 387:18, 21 390:6 391:1, 11 392:8 393:3, 8, 12 394:10, 16, 20, 21 395:17, 24 396:3, 6, 7, 7, 9, 10, 18 400:5, 9, 12 403:6 405:1, 4 413:16 427:23 429:2  
**questioning** 140:15, 19  
**questions** 7:16, 20 8:12 19:18 21:17 42:20 43:2, 12 48:19 57:21 58:2, 11 59:5,

7 72:11, 14 74:17 82:23 122:15 142:3 161:21 196:7, 10, 11, 18 199:8 200:13, 21 201:11 208:21, 22 221:16, 19, 21, 21 223:10, 16 226:2 241:1 242:2 329:8 330:4, 9, 15, 17, 18 344:19 351:19 358:10 381:15 382:10 383:20 402:20 403:4, 23 404:13 405:12, 14, 17, 21 416:11, 12 424:4 429:18 434:6  
**question's** 166:9 426:6  
**quick** 18:11 176:8 427:22  
**quickly** 7:15 95:12 280:21 307:13 316:1  
**quid** 149:11, 14, 15 215:12  
**quiet** 14:16 19:11 175:19, 22 278:17  
**quit** 262:5  
**quite** 63:21 234:5 346:19 425:15  
**quiver** 344:2  
**quizzed** 309:3, 4, 4  
**quo** 149:11, 15 215:12  
**quote** 95:6, 7 170:2 220:11 222:16 328:12  
**quoted** 95:22 177:6 341:9  
**quotes** 95:24

## &lt; R &gt;

**races** 424:18  
**radical** 136:10 211:7  
**radically** 238:18  
**raise** 186:23 216:13 255:1 267:2, 5 342:21, 22 419:14  
**raised** 161:18, 23 217:20 230:23 260:8

**raising** 354:23  
**random** 417:22 419:3  
**Range** 106:1 150:19 209:17 285:7 342:12  
**rapidly** 428:24  
**rates** 372:7  
**Raymond** 40:8, 9, 13, 16  
**reach** 92:22 415:6  
**reached** 92:23 99:19 262:14  
**reacted** 212:10, 11, 13  
**read** 6:15 14:23 15:2 23:22, 24 32:9 47:4, 6 48:7 52:1, 2, 3, 6, 7 54:17 55:5, 20 56:17 57:6 58:1 59:1, 12, 19 60:3, 11, 16, 18 73:1 81:19, 23 82:24 112:4, 16, 21 122:14, 22 127:4 142:22 157:2, 3, 6 159:16, 17, 19 162:13 170:4 173:20 176:7 177:5 179:6 191:8 193:8, 9 197:4, 7 200:4 201:19 219:17 230:10, 13 240:13, 20 270:18 271:24 278:21, 23 284:22 292:17 313:12 319:10 320:16 342:16 346:11 348:5 349:12 354:9 362:2, 19 363:18, 24 368:23 374:8 375:18 380:6, 20 381:10, 14, 17, 18 389:24 390:7 392:21 399:24 400:6, 8, 13, 14, 15, 16, 17, 22 402:6, 8, 9 403:16 406:18 417:18 418:11 420:1, 6 421:7 422:6 427:22 432:4 434:4  
**reader** 179:16 191:2  
**reading** 54:23 200:6 220:11 284:7 385:15  
**reads** 55:8



<b>ready</b> 59:22 191:9 192:14, 15, 15 292:8 324:14, 22, 23 326:14, 17 394:7, 8 <b>real</b> 176:8 249:15 427:22 <b>realize</b> 416:10 <b>realized</b> 85:10, 11, 14 92:15 244:4 <b>really</b> 7:15 42:21 51:14 115:14 137:12 144:18 159:7 184:10 194:14 210:7, 8 223:4 239:3 240:7 248:12 274:11, 16 279:6 280:17 290:6 305:15 314:16 359:13 371:1 385:22 426:20 <b>rearrange</b> 337:18 <b>reason</b> 13:23 80:24 86:22 88:7, 18 100:10 128:14 137:8, 19, 21 139:3 164:10, 19, 20 165:24 182:17 183:2, 3 197:13 244:11 262:3 267:16 282:4 375:16 378:17, 20, 21 380:19 408:1 411:22 412:3 432:6 433:5, 8, 11, 14, 17, 20, 23 <b>reasoning</b> 165:1 <b>reasons</b> 85:17, 20 86:5, 15 87:20 88:18 150:19 168:21 172:23 <b>Rebel</b> 267:5, 7 <b>recall</b> 38:1 131:11, 13 242:18, 19, 21, 22 363:6 379:20, 21 421:3 <b>receipt</b> 432:15 <b>receipts</b> 377:22 <b>receive</b> 43:19 103:11 252:15 415:1 419:7 <b>received</b> 103:8 160:24 261:4, 13 304:3 348:6, 16	369:12 380:1 384:24 385:1, 2 <b>receiving</b> 103:4 252:13 339:14 417:19 <b>recess</b> 37:2 102:7 145:14 192:3 316:10 <b>recite</b> 283:19 284:22 <b>recognize</b> 41:21 176:12 402:11 <b>recollection</b> 122:23 <b>reconcile</b> 261:16 <b>record</b> 5:9, 21 6:8, 15 8:5, 19 9:8 23:16 32:8 36:20, 24 37:6 52:3, 5, 9, 10 56:1, 2, 19 58:24 60:16, 18 61:4 71:8 84:6 88:16 91:8, 10 102:5, 11 125:17 127:2 144:20 145:12, 19 148:24 152:15 192:1, 7 195:5 209:9 223:5, 15, 17 224:13 229:11 233:11 240:6 244:21 316:8, 15 319:12 323:13, 14, 17, 19 324:23 325:8, 23 326:9 345:2, 4 359:1 372:20 373:14, 19 375:21 386:1 387:7, 10 392:11 403:6 416:8 429:17, 20 431:8 <b>recorded</b> 5:11 81:13 431:6 <b>Recording</b> 3:14, 21 71:5 75:19, 23 76:3, 6, 15, 16 79:16 80:9, 15 81:3 121:10, 19, 20 133:5, 12 150:24 151:6, 13 236:23 237:1 275:12, 14, 21 276:12, 17, 23 277:1 278:20 <b>records</b> 125:18, 24 127:4, 12 142:19 388:20 389:16, 20, 21 <b>recruit</b> 171:23 172:1	<b>red</b> 286:3 <b>reduce</b> 58:11 231:21 <b>refer</b> 158:18 174:16, 17 383:20 <b>reference</b> 320:8 407:6 414:13 429:6 <b>referenced</b> 261:1 373:15 <b>references</b> 255:7 <b>referencing</b> 226:16 240:16 263:24 313:18 318:9, 11, 13 330:20 407:13 427:19 429:4 <b>referred</b> 80:8 227:11 <b>referring</b> 97:22 100:2, 9 103:13 177:20 178:11, 17 319:14 336:24 347:16 348:7 361:18 362:6 364:2 406:24 408:23 <b>reflect</b> 319:13 <b>reflects</b> 256:17 <b>refreshers</b> 117:21 <b>refusal</b> 362:18 <b>refused</b> 332:14 <b>refusing</b> 56:12 <b>regard</b> 21:9 337:17 360:4, 6 <b>Regarding</b> 107:22, 22 329:3 338:7 389:18 417:6 <b>regime</b> 256:24 <b>regularly</b> 347:7 <b>regularly,</b> 347:21 <b>reimburse</b> 377:24 378:1 379:12 <b>reimbursed</b> 376:10, 22 378:6, 9 379:5 <b>reimbursement</b> 377:14 <b>reimbursing</b> 379:17 <b>reinstated</b> 368:17 380:10, 12 <b>reiterate</b> 318:21 <b>reiterated</b> 252:2 <b>rejoined</b> 12:23, 24 13:2 <b>relate</b> 324:2 367:9	<b>related</b> 20:11, 12, 13 70:10 109:21 110:19 152:17 286:6 318:24 368:21 373:2 422:19 423:1 <b>relating</b> 272:14 <b>relations</b> 21:2 74:4 93:16 138:17 180:10, 22 181:12 213:23 309:10 312:13 <b>relationship</b> 17:14 20:14, 20 155:1 156:2 189:12 304:15, 23 305:5, 20 308:15 339:6 <b>relationships</b> 155:4 <b>relevancy</b> 154:13 <b>relevant</b> 43:12 128:8 154:7 195:14, 18, 21 <b>relief</b> 255:24 <b>reluctance</b> 363:11 <b>rely</b> 248:5 <b>rem</b> 144:14 <b>remain</b> 93:4, 6 366:5 368:23 423:10 <b>remainder</b> 409:22 <b>remained</b> 253:3, 17 <b>remaining</b> 427:7 <b>remains</b> 348:23 375:9 <b>remember</b> 10:5 14:24 21:5, 6, 7 25:4, 8, 11, 12, 21 27:13 28:3 33:8 37:19, 21, 22 38:16 40:1 45:14, 18, 20, 22 49:21 69:19, 22 70:1 87:17 89:1, 2, 4 93:8, 9 96:6 100:1, 4 102:18 103:8 105:2, 4, 24 110:16, 23 111:7 115:2 123:18 129:15, 17 131:23, 23, 24 135:23 143:24 144:5, 17 146:12 162:6 174:21 176:5, 10, 11 181:24 190:7, 9 192:19 199:5, 6, 18 200:5 204:7 208:7 228:7 231:14 234:3 241:20 242:23
---	--	--	---

252:13 256:15	<b>reported</b> 1:14 96:3, 9	<b>Representing</b> 2:6, 11,	203:9 212:21 218:22
258:15 262:13	105:10 129:23 152:5	16 6:13 66:17 386:6	219:2, 15 320:14
286:15 288:3 296:19	172:4, 24 192:17	387:14	367:11 370:1 373:24
297:16 307:14	272:11 322:12	<b>reprieve</b> 348:6, 10, 16	397:20, 21 421:7
323:23 333:15	375:15	355:22 406:6	<b>responses</b> 7:20 9:3
343:13 346:10	<b>Reporter</b> 1:16 5:18,	<b>Republican</b> 317:6	67:1 359:22 399:16
352:11, 14, 15 353:23	21, 23 6:3, 16 8:24	318:1, 18	<b>responsibilities</b>
378:2, 5 387:24	14:14, 16 15:2 23:24	<b>reputation</b> 338:7, 11	130:13, 14
389:15 398:7 407:7	27:11 30:1 47:3, 6,	349:6 354:7	<b>responsibility</b> 78:4, 4
408:6 410:20 413:7,	11 48:6, 8 70:21, 23	<b>request</b> 66:3, 13	156:10, 15, 17, 22
19, 20, 22 414:3, 9	74:1, 10, 22 75:3	112:11, 13 113:4	157:13 328:2, 5
417:19, 22, 24 418:3	79:6 81:8 82:21	125:20 199:7 263:4	368:19
420:12, 14 421:21	87:1 90:19 91:6	373:14, 19, 23 399:10	<b>responsible</b> 147:8, 13
<b>remember,</b> 7:22	99:9 102:12 106:10	<b>requested</b> 112:13	158:7 186:24 216:3
<b>remind</b> 131:23 162:3	108:5 111:17 115:14	241:8 262:24	<b>responsive</b> 7:23, 23
186:6 269:17 272:24	118:17 137:13	<b>requesting</b> 399:8	112:11 113:2, 3
<b>reminded</b> 428:9	139:12 144:14 146:3	<b>requests</b> 65:4 66:24	344:21 373:21 399:3,
<b>remotely</b> 1:12 5:24	149:13 151:7 157:6	67:1 112:8 399:3, 16	10, 20
6:4, 22	168:3 175:15, 19	<b>require</b> 93:4 358:10	<b>rest</b> 230:10 240:20
<b>remove</b> 320:23	179:15 197:7 201:17,	<b>required</b> 114:9	<b>restated</b> 368:17
<b>removed</b> 136:11	19 205:12 207:21	<b>requirements</b> 17:24	<b>restrictions</b> 90:4, 7
157:19 197:22	209:7 221:4, 9 244:6,	<b>requires</b> 22:14 423:6	91:15 380:20
204:11 251:11	9 250:14, 17 278:17,	<b>research</b> 184:1, 8, 16,	<b>resulting</b> 362:18
320:22 336:23	23 290:4 296:8	17, 18, 18, 22 185:7, 8	<b>resume</b> 224:1, 5
339:23 347:6, 15, 17	300:12 310:14 316:5	305:14 388:7 397:9,	<b>resumed</b> 91:3
<b>removing</b> 228:12	325:18 326:1, 6, 13	19 417:8, 9	<b>retain</b> 28:17
<b>remuneration</b> 231:22	328:17 345:7 353:15,	<b>reserved</b> 5:5	<b>retained</b> 136:12
356:4 367:24	19 376:14 399:15	<b>resignation</b> 420:4	<b>retaliate</b> 130:2, 7
<b>repeat</b> 8:13 32:8	414:5 429:16	<b>resolution</b> 153:1, 3, 5	<b>retaliated</b> 129:22
<b>repeated</b> 153:24	<b>reporters</b> 75:15 236:5	158:16 187:13 309:6	<b>retaliation</b> 129:21
<b>repeatedly</b> 163:21	<b>Reporting</b> 5:17, 19	<b>resolutions</b> 143:7	131:18, 19 293:21
184:4 186:12	119:4 176:17 180:4	<b>resolve</b> 43:10 98:22	294:2, 4, 8, 13, 18, 21,
<b>repeating</b> 134:4	198:19 238:21 308:6	99:14	24 322:17, 19, 23
323:1 370:3	329:5 337:2, 6, 10	<b>resources</b> 119:8	326:22 327:6, 7
<b>repercussions</b> 288:18	338:2 339:24 366:21	148:10 149:24	328:21 329:5, 21
373:7, 8, 10, 15	375:23	250:20 328:7	331:1 338:15
<b>rephrase</b> 8:13	<b>reports</b> 95:7 108:12	<b>respect</b> 363:10	<b>retold</b> 150:16
<b>replace</b> 231:9	118:3 148:2 162:5	<b>respective</b> 5:2	<b>return</b> 13:7, 7, 8
<b>replied</b> 190:12 192:13	238:22 248:16 294:6,	<b>respond</b> 65:24 72:14	84:20 253:2, 7, 16
<b>reply</b> 318:5, 8	7 329:20 374:24	73:4	277:24 278:6, 9
<b>report</b> 95:1, 8 97:23	376:5, 8 384:11	<b>responded</b> 66:6, 10,	432:13
98:12 117:1 118:15	<b>represent</b> 6:10 64:2,	13 420:1	<b>returned</b> 279:4
136:4, 6 150:8 171:4,	21 65:2 97:13 190:6	<b>responding</b> 189:19	402:21
7, 8, 8 198:23 274:7	252:17 349:22	294:5 380:9 391:10	<b>returning</b> 348:17
321:17 326:22 327:7	354:14 386:12	418:3 419:12	371:5
330:18 333:2 334:24	416:14, 17, 19 428:1	<b>responds</b> 243:5	<b>reuse</b> 417:15
336:14 338:15, 16	<b>representation</b> 427:7	346:12	<b>review</b> 51:13, 15, 23
339:13 340:15	<b>Representative</b> 2:22	<b>response</b> 7:21 8:23	59:4 252:6 282:16
363:17 375:12	<b>represented</b> 64:18	73:6 112:7 117:3	389:16, 20 418:9
380:14	67:5 98:21 99:2	118:3 125:19 126:8	

<p><b>reviewed</b> 162:11 390:7 397:14 <b>reviewing</b> 362:17 <b>reviews</b> 52:11 <b>revise</b> 86:10 <b>RICO</b> 260:6 261:1, 7, 9, 20 262:12 <b>rid</b> 350:5 <b>ridiculous</b> 36:15, 16, 19 57:11 59:11 330:11 344:16, 16 <b>RIESER</b> 2:13 6:17, 17 41:16, 23 42:10, 13, 16 385:21, 23 386:10, 16 387:3, 6, 9, 14 410:9 415:4, 8, 13 416:5, 15, 20, 23 <b>right</b> 16:22 18:16 22:6 30:2 31:11 36:11 43:15 55:12 59:14, 18 64:3, 11, 22 67:2 77:5 80:12, 16, 20 84:5, 15, 18 87:19 88:18 89:2, 3, 8 91:16 101:23 103:16 112:1, 23 117:12 120:19, 20 121:18 122:3, 9 124:3, 9, 12 125:5 126:15 128:5, 15 130:11, 20 131:4 132:18 134:1, 23, 24 135:19 136:20 140:11 144:6, 22 145:8 147:6 149:12 151:9 152:6 154:16, 23 155:12 160:15 163:14 176:1, 21 177:10, 24 179:9 180:20 181:10 183:19 187:9 189:13 191:24 192:9, 10 193:22, 24 195:21 196:2, 2, 17, 21, 23 197:17 198:18 200:2 205:5, 23, 24 206:14 207:7, 24 208:4 212:4 213:6 216:10, 22 217:2 218:5, 9 220:1, 22 222:4 223:1 226:1 228:23</p>	<p>229:1 230:4, 5 231:9, 13 232:8, 17, 23, 24 233:2, 3, 4, 5 236:5 241:2, 12, 22, 24 242:9, 11, 14 243:5, 22 246:10 248:20 249:18 250:7 251:16, 17 252:9 253:17, 18, 21, 22 255:3, 9 259:12, 22, 24 260:2 262:21, 24 263:24 264:5, 8, 8, 11, 17 265:22 266:17, 19 270:19 272:19 273:9 275:18 278:10 279:14 282:23 283:13, 20 284:5, 19, 23 285:13, 18 286:7, 23 287:14, 19 289:2, 6, 12 290:12, 13 291:12 292:4, 5, 7, 7, 9, 12, 13, 14 293:2, 8, 12, 13 294:2 295:11, 17, 22, 24 298:13, 14 299:7, 14 300:24 301:5, 6, 11 302:24 303:16, 17 304:15 306:10, 11 307:3, 10 308:7 309:24 310:3 313:12 314:22 315:21 317:13 318:10, 24 319:20, 24 320:16, 20 322:9, 19 323:5, 12, 13 324:5 325:15 330:8 333:18 337:7 339:16 340:18 341:15, 16, 22 344:6, 13, 21 345:22 346:15 347:3, 3, 21 348:5, 10, 22 350:6, 13, 14 352:6 353:8, 8 354:4, 9 355:3, 19 357:5 359:2 360:7 361:16 362:5, 10, 11, 14, 15, 20 363:3, 19 364:22 366:8, 9, 16 367:3 368:8, 13 369:1, 19 370:7 371:8, 20 372:13, 23 374:8, 12, 19 375:20 376:5</p>	<p>384:19 386:18 387:4, 16 390:18 394:4 395:10 396:12, 19 398:9, 19 402:4 403:17 405:1 406:5, 6, 8, 19, 20 407:4, 14, 24 408:12, 20, 21 409:8, 10, 10, 20 410:8, 19, 22 411:3, 19 412:23 414:2, 23 417:3 418:17 420:7 422:18 426:22 427:17 429:13, 14, 16 <b>rights</b> 217:11 416:15 <b>rises</b> 150:1 <b>Robinson</b> 267:13 279:21 285:4, 10 286:3, 18 287:3, 11 289:16 316:21 373:5, 12 <b>Robinson's</b> 374:8 <b>rogue</b> 233:2 367:9 <b>role</b> 84:23 114:12 136:12, 12 347:8 348:17 380:5 <b>Roman</b> 2:16, 21 6:18 7:6 12:15 24:6, 10, 18 26:16, 20, 24 33:9, 12, 16 37:9 62:15, 18, 21 70:24 71:13 74:21 75:2, 10 77:24 78:5, 18, 22 84:19 86:19 89:10, 15 93:2 107:7, 10, 13, 23, 24 113:9, 22 114:2, 11 119:16 122:8 136:23 138:14 143:19, 19 144:6 145:21 146:13 150:12 151:8 154:6 155:20 156:11 159:15 168:21 171:1 179:8 181:17 184:7 185:17 188:2 189:11, 13 196:23 198:17 202:7 203:19 212:14, 15, 18 214:16 217:11 232:3, 20 234:20 235:1 236:12 240:11 243:24 244:12 255:8 256:2, 20 257:6</p>	<p>258:7 273:21 275:7 292:19 293:17 294:5 295:3 298:21 299:7 301:16 303:23 304:15 308:7 314:19, 23 320:4 321:12, 20 329:4 333:2 354:13 360:8, 17 361:24 363:23 364:6, 17 365:17 367:9 368:17 371:5 386:6 389:18 390:1, 9 407:21 418:12 422:7 <b>Roman's</b> 63:6, 15, 18 89:23 147:6 155:12 185:21 186:3 211:23 219:15 249:19 250:3 251:3 320:17 369:13 386:8 <b>room</b> 77:15 96:10 150:13 151:8 152:3 164:22 165:18 166:3, 13 168:7 169:11 193:17 204:8 212:16 214:17, 18 215:7 236:14 428:13, 15 <b>roughly</b> 220:17, 18 313:4 <b>round</b> 193:22, 23 201:4 241:24 <b>rub</b> 116:16 <b>rule</b> 19:6, 11 57:17 117:4 425:22 <b>Rules</b> 98:13 226:3 401:21 <b>ruling</b> 55:17 <b>rumor</b> 137:6, 17 138:12, 14, 16, 20, 20, 21, 22 139:9 143:9 150:1, 16 153:24 301:20 302:8 303:3 307:11 308:1 309:15 311:24 343:10, 10, 12 354:21 355:2 356:15 361:19, 21, 22 370:22, 23 406:3 407:5 408:14 419:4 428:8, 19 <b>rumor,</b> 138:12</p>
---	---	--	---

**rumors** 149:18, 22  
 314:8, 13 354:7  
 362:2 418:23 429:1  
**run** 7:14 145:2  
**running** 339:21  
**ruse** 202:3  
  
 <S>  
**sabotage** 344:18  
**safe** 237:17 238:1, 9, 11  
**safeguards** 238:12  
**safety** 164:11, 11  
 172:3 182:19  
**sake** 234:8 405:15  
**salary** 27:2, 4, 5, 5, 7  
 37:20 232:9 366:5  
 419:7 422:13  
**Samantha** 147:8  
**sat** 159:5 192:18  
**satchel** 344:2  
**satisfaction** 125:10  
 136:16 150:21  
 152:24 157:1, 10  
 158:15 184:19  
 238:19 251:11  
 259:18, 20  
**satisfactorily** 128:24  
 136:15 171:9 239:5  
**satisfied** 177:15, 18  
 209:23 241:6  
**saw** 85:10 92:15  
 98:6 110:17 114:20  
 116:7, 8, 18 235:5  
 280:13, 23 281:3  
 370:22 399:24 400:6  
 418:19 428:23  
**saying** 32:22 83:16  
 87:4 95:23, 24 96:8  
 110:21 112:21 114:5  
 127:2, 20 129:3  
 132:1 143:16 153:2  
 158:4 172:18 173:2  
 177:7 190:23 215:19  
 218:5 222:11, 12, 13  
 224:10 244:11  
 247:19 255:15  
 262:20 263:9 264:10  
 265:8 267:20 277:3  
 288:14 290:10, 24

300:20 309:14, 23  
 311:3 312:2, 3, 3, 4, 4,  
 5, 20, 20, 20, 21 313:4,  
 8 322:7 323:23  
 333:5, 8 338:19  
 341:14 342:18, 19, 19,  
 20 344:22 347:13  
 348:8 354:4, 16  
 357:14 361:9 368:24  
 370:11 375:22, 24  
 376:1 378:24 379:1,  
 1 388:12 390:17  
 410:2, 3 411:24  
 412:1, 11 427:5  
**says** 54:19 59:10  
 61:19, 20 62:8 63:11,  
 14 64:6, 15 67:18  
 124:14, 19, 19 178:22,  
 22 189:4 198:11  
 211:14 214:17 224:4  
 230:19 241:5, 13  
 243:3 249:5, 8  
 252:12, 19 254:23  
 255:4, 6 263:21  
 280:7 302:14 306:7  
 307:10 321:16 329:2  
 330:22 332:20  
 336:21 346:12, 22  
 347:4, 15 356:15  
 360:8 366:8 371:10  
 377:8 379:23, 24  
 385:3 402:3, 4  
 411:21 421:22 428:4,  
 11, 11, 21, 21, 21  
**scared** 174:20 182:8,  
 18  
**scene** 158:23  
**schedule** 370:14  
**scholarship** 216:14  
**scope** 75:20 212:17  
**screamed** 152:2  
**screen** 51:9 60:12, 13,  
 14 81:14, 18 122:18  
 233:10 292:6  
**Screenshot** 3:13 64:4  
 121:10, 17 346:13  
**screenshots** 106:7  
 121:15  
**scroll** 241:4 319:15

**scrolled** 319:13  
**scrolling** 240:21  
**scuttle** 13:10 262:11,  
 12  
**scuttled** 13:9  
**seal** 431:11  
**sealing** 5:3  
**search** 125:18  
**second** 8:9 22:20, 21  
 46:17 60:14 85:24  
 86:7 120:19 131:1  
 162:22 179:7 193:23  
 194:21 198:21 206:9  
 261:3 265:9 285:23  
 291:7 312:5 333:23  
 337:20 349:8 373:23  
 382:1  
**secondary** 194:9  
**secondly** 137:5, 17  
 259:17 358:9 400:10,  
 14  
**secret** 171:19 268:19  
 269:3, 17 272:17  
**secretary** 64:6 67:21  
 68:18, 20  
**secrets** 261:19  
 264:22, 23 268:22  
 269:24 270:16  
 271:22  
**section** 60:5, 16, 18  
 64:10, 15 66:19  
 67:16 247:8  
**see** 51:9 53:7 58:19  
 63:10, 11, 14 64:22,  
 23 66:16, 18 67:18  
 68:8 87:13 116:8  
 120:20 122:9 124:19  
 127:6 130:15 134:9  
 141:7 157:12 160:14  
 176:2 177:8 178:24  
 181:10 182:12  
 184:20 188:3 189:20  
 190:10 193:18 199:7,  
 8 200:3 207:2 218:9  
 240:13, 18 241:1  
 242:19, 21 243:1, 7  
 257:9, 13, 17 280:22  
 292:8 294:4 296:14  
 306:21 316:17 318:8,  
 24 319:3, 3, 7, 8, 8, 11,

14, 16, 16 345:10, 18  
 346:12 352:16, 16, 17  
 354:4 357:11 360:7,  
 12, 13, 14, 17, 19  
 365:16 370:20, 20  
 372:3 376:3 380:20  
 381:19, 22 383:21  
 403:17 404:9 406:8  
 419:21, 23 420:2  
 422:2, 2, 3, 3, 3  
**seeing** 336:9 372:4  
 417:10  
**seek** 185:6  
**seeks** 183:21  
**seen** 53:5 63:9 98:3  
 116:10, 16 177:16, 19  
 279:16, 19 281:11  
 314:18 398:10 399:1  
**select** 124:13 127:16  
**self-evident** 183:23  
**Self-explanatory** 249:4  
**self-reporting** 98:14  
**send** 28:10 43:4, 8  
 144:10 177:24 178:1,  
 5, 7 219:4 247:18  
 262:20 263:8, 9, 12  
 264:14, 14  
**sending** 247:8 417:2  
**sense** 60:12 255:21  
 259:15 274:17  
 318:23 319:9  
**sensitive** 196:22  
 197:10, 11, 12  
**sent** 110:1 122:8  
 124:11 127:9 130:14  
 173:21 174:2 178:15,  
 20 189:21 190:1, 2, 6  
 192:12 199:6 211:5  
 218:10, 14, 15, 16, 18  
 219:5 227:22 228:4  
 241:16 242:16, 23  
 243:2, 11, 19 248:11  
 252:10 262:2 264:4  
 266:24 267:1 268:7  
 292:9 302:12 316:18  
 330:21 337:5 363:18,  
 21 380:23 382:24  
 402:18 407:20 420:6,  
 16



<p><b>sentence</b> 124:18 188:3 200:6 220:4 240:16 332:20 348:2 356:14 358:19 359:6 382:4 <b>separate</b> 15:12, 19, 23 16:1 218:13, 14 241:8 269:18 271:23 367:22, 23 423:7 <b>September</b> 261:6 <b>sergeant</b> 115:9 <b>serial</b> 184:2 <b>serious</b> 106:1 131:13 184:11 231:7 309:1 <b>Seriously</b> 36:10 136:9, 9 164:13 170:3 173:17 188:22, 23, 24 344:15 399:15 428:8 <b>seriousness</b> 220:5 <b>serve</b> 252:20 <b>Serving</b> 317:17 <b>session</b> 7:19 315:11 <b>set</b> 26:20 89:15 125:20 341:3 <b>SETH</b> 2:3 6:11 14:12 20:5 23:7 28:7 31:15 35:11 36:7, 19 41:16, 22, 23 46:13 49:6 51:14 52:18 56:3, 6 74:13 91:6 101:24 102:12 109:16 146:3 148:13, 17, 19 149:1, 13 159:15 178:9 184:9 191:11 205:21 208:19 210:14 221:24 223:3 226:7 240:15 244:24 265:9 269:15 270:14, 22 271:5 284:2 329:16 330:12 357:15 359:4 381:1 382:9 385:21 386:16 393:2 395:5, 12 396:16, 23 410:9 416:6, 15 <b>seth@dereksmithlaw.c</b> <b>om</b> 2:5 <b>setting</b> 350:2 412:9</p>	<p><b>settle</b> 99:3 <b>settled</b> 43:6 <b>seven</b> 94:23 136:2 164:5 197:14 242:7 280:24 298:19 332:15 354:15 365:4 401:14, 18 416:2 426:21 <b>seventh</b> 415:7 <b>severely</b> 356:3 363:15 <b>sex</b> 75:11, 15 77:15 151:9 154:6 159:9, 11, 12, 19 160:1 162:10, 13, 15 163:5 165:14 212:15 213:20 215:7, 10, 11, 21 236:5 301:17, 23 302:8, 21 303:3 305:15 <b>sexual</b> 79:14 95:10 106:3 110:19 129:18, 20 131:10 132:14, 15, 18 137:1 138:15, 17 141:10 148:2 149:11, 15 154:5, 15, 16, 22, 23 155:3 156:21, 24 157:14 159:10 162:17 164:12 171:4, 12 176:14 177:23 179:6 184:2 188:2, 7, 17, 20 189:4 194:8, 8 198:13 202:8 209:16 211:15, 15, 21 212:1 215:12, 23 220:4 227:9, 10 233:4, 6 238:21 245:24 303:16 304:16, 23 305:5, 11 306:14, 17, 21 322:12, 15 336:22 342:23 349:5 366:21 367:15, 16 <b>sexually</b> 97:1, 10 107:1 177:23 302:15 303:24 304:2 <b>Shardelle</b> 9:22 <b>S-H-A-R-D-E-L-L-E</b> 9:22 <b>share</b> 164:21 168:14 292:6</p>	<p><b>shared</b> 143:6 165:18 166:3, 13 168:7 <b>Shargel</b> 9:19, 21, 24 <b>sharing</b> 359:3 <b>she'd</b> 289:23 323:2 334:9, 22 <b>sheet</b> 432:7, 9, 11, 14 434:9 <b>she'll</b> 175:2 <b>Shikunov</b> 109:17 <b>shoddy</b> 349:15 <b>short</b> 375:13 427:8 <b>Shorthand</b> 1:16 431:7 <b>shortly</b> 336:16 368:1 <b>shot</b> 419:24 <b>shoulder</b> 252:24 <b>should've</b> 74:2 75:16 168:16 172:4 184:8 <b>show</b> 89:17 168:9 174:9, 9, 10 190:5 199:1, 3, 3, 4, 7 208:7 231:23 247:22 251:16 283:14 302:14 306:20 314:5 321:22 322:6 418:10 419:6 420:1, 20 <b>showed</b> 60:5 106:7 107:10 110:5 173:22 174:2, 4, 11 210:24 232:6 <b>shown</b> 79:8, 13 <b>shows</b> 190:14 261:23 <b>shrugs</b> 8:1 <b>shuffling</b> 414:6, 12 <b>sic</b> 46:5 148:13 213:19 217:10 348:6 380:11 408:5 <b>side</b> 107:17 207:1 348:23 407:24 <b>SIDNEY</b> 2:13, 23 <b>sign</b> 6:15 214:18 239:19 247:10, 13, 20, 24 379:9 432:8 <b>signaled</b> 85:23 <b>signature</b> 431:11 434:11 <b>signed</b> 129:1, 2 150:13 152:24 153:2 158:4, 6 172:18</p>	<p>187:14, 16 189:15 212:17 218:4, 6 239:16 247:15 <b>significant</b> 192:22 368:5, 7 <b>signing</b> 367:10 432:10 <b>similar</b> 150:23 222:17, 18 264:15 <b>simple</b> 20:20 25:8 49:1 56:12 80:15 257:12 284:17 330:23 331:5 354:9 356:23 379:7 393:8 400:12 405:14 <b>simply</b> 83:20 85:9 323:1 334:15 379:11 <b>simultaneously</b> 234:14 <b>single</b> 54:12 129:11, 13 187:17 205:17 206:1 219:6 312:24 337:18 340:14, 15 357:18 <b>single-word</b> 361:15 <b>Sir</b> 87:1 90:19 108:6 121:15 139:12 144:15 296:8 <b>sit</b> 30:13 56:16 62:18 81:18 107:14 <b>sitting</b> 115:2 218:1 283:20 284:5, 9, 19 394:6 395:19 <b>situation</b> 160:5 347:5, 17 350:11 361:11 375:9 420:5 <b>situations</b> 218:21 219:1 <b>six</b> 94:4 123:8 136:2 252:22 298:19 345:8 362:8 399:19 400:4 <b>sixth</b> 421:6 <b>Sixty-two</b> 374:2 <b>skeptical</b> 96:2, 21 200:1 202:5 <b>sketched</b> 375:11 <b>skilled</b> 231:20, 24 <b>skills</b> 225:16 <b>skip</b> 420:22 <b>Slack</b> 111:20 112:14</p>
---	--	---	---

<b>Slacks</b> 142:22	<b>sort</b> 57:12 95:10	143:23 258:24	<b>standing</b> 363:14
<b>slander</b> 338:7 349:6	116:19 172:3 182:19	292:24	385:24 387:18 431:4
<b>slandering</b> 308:7	<b>sorts</b> 77:11 93:18	<b>specifics</b> 29:4 50:23	<b>standoffish</b> 419:24
<b>sleep</b> 96:8, 14 174:23	155:2, 4 168:21	73:8, 15 74:3 144:5	<b>standoffish,</b> 419:16
189:5	181:10 184:14, 21	152:20 267:17 278:7	<b>stands</b> 162:1
<b>slightly</b> 350:22	201:24 234:12	352:22 370:3, 8, 15, 20	<b>start</b> 16:10, 12, 17, 21
<b>slit</b> 228:17, 19, 19	238:11 308:20 314:8	<b>speculating</b> 406:17	34:7 70:2, 4 293:3
229:2	315:3 337:23 375:22	407:1, 8, 15 408:4	300:12 349:16
<b>slower</b> 328:18	388:9, 12 389:21	<b>speculation</b> 408:6	<b>started</b> 16:14 24:11
<b>small</b> 336:6	<b>sought</b> 256:1	<b>speech</b> 223:14	34:6 73:1 110:4, 23
<b>smaller</b> 40:10	<b>sound</b> 309:21	224:11, 14 225:21, 24	118:23 120:9, 12
<b>smiles</b> 158:20	<b>sounds</b> 276:3	<b>speed</b> 241:6	138:22 139:9 212:20
<b>SMITH</b> 2:1 108:15	<b>source</b> 98:17 137:22	<b>spend</b> 54:22 55:7	259:21 304:4 314:8
109:7, 12, 15, 18	<b>south</b> 99:15	57:8 128:20 161:17	354:6 362:2 370:1
110:2, 8, 12 147:7	<b>space</b> 432:6	242:1 314:15 419:3	406:4
158:23 340:22	<b>speak</b> 7:16 8:3, 16	<b>spending</b> 233:8 379:3	<b>starting</b> 16:6, 23
<b>snarky</b> 111:22	14:11, 20 19:16	<b>spent</b> 152:22 185:2	74:12 257:1 424:21
<b>social</b> 6:1 183:20, 21	35:20 36:2, 14 44:24	279:21 376:11	426:7
397:14, 23	58:19 115:15 126:7	379:18	<b>state</b> 9:7 61:14
<b>software</b> 8:18	175:20 209:21	<b>spew</b> 338:7	137:15 140:11, 15, 19
<b>solicitation</b> 11:18	234:17 235:21	<b>splitting</b> 348:24	401:1 432:6
<b>solution</b> 177:15	238:15 243:16 246:6	<b>spoke</b> 102:16 125:3	<b>stated</b> 339:20 340:7
185:14	254:3 260:24 278:15	193:10 208:10 276:9	<b>statement</b> 18:13 31:3
<b>solutions</b> 142:18	285:1 290:7 300:7	277:15 312:15, 22, 23	59:16 103:15 193:6
143:7	324:15 327:20 345:3,	393:15, 17 395:22	199:2, 5 205:1
<b>solved</b> 125:9 129:8	5 357:7 358:24	428:16	337:18 362:16
418:23	359:20, 21 363:9	<b>spoken</b> 126:5 276:8	388:17 389:2, 11
<b>somebody</b> 236:15	428:17	<b>spread</b> 303:2	398:16 404:23
388:18 428:22	<b>speakers</b> 80:2	<b>spreadsheet</b> 418:9	<b>statements</b> 126:15
<b>someone's</b> 303:3	<b>speaking</b> 36:3 76:17	<b>spring</b> 136:1 164:14	205:7, 14 208:13, 18
<b>something's</b> 117:4	152:14 175:17 180:2	171:15 172:5, 8	209:1, 2, 13, 13 211:6
<b>sorry</b> 7:10 12:12	237:10 277:5 287:23	286:16 355:7	314:13 375:16
16:20 24:8 39:16	292:3 304:6 338:8	<b>stab</b> 175:2, 3, 5	385:13, 14, 17 386:15
56:9 71:10 78:9, 15	350:12 377:4	<b>Stacey</b> 104:13 211:22	387:2, 21 389:1, 3
79:6 88:12 97:18, 21	<b>speaks</b> 67:8 361:1	<b>staff</b> 20:19 77:18	390:19 398:17, 20
99:2 101:9 120:10,	<b>special</b> 219:8, 10, 12	85:3, 4 90:23 93:12,	399:1, 24 400:6, 9, 13,
18 122:18 127:8, 23	<b>specialist</b> 5:17 11:19	16 119:19 124:13, 15	23, 24 404:10, 17
141:23 144:19, 20	19:1 134:8 184:24	126:4, 6 127:16	<b>STATES</b> 1:1 5:13
146:3 147:11 157:2,	294:19 327:3	143:2 148:15 150:17	86:18 159:13, 14
3 165:3 175:18	<b>specialize</b> 184:4	180:4 215:6 243:21	162:18
180:6 188:15 192:24	<b>specialized</b> 28:22	256:12 305:6 312:8,	<b>stating</b> 6:7
195:18 242:5, 20	54:9 425:12	13 313:1 379:23	<b>Station</b> 99:20 269:7
255:5 273:17 286:20	<b>specific</b> 34:1, 2 79:10	403:15 423:9, 9	<b>stations</b> 269:12 412:9
289:10 297:12 301:2	127:18 140:8 214:7	<b>staffer</b> 188:2	<b>status</b> 12:6 363:18
318:4 322:5 328:17	251:10 258:14	<b>staffers</b> 189:13	369:5, 11
343:3 353:19 355:5	350:24 370:9, 9, 13,	<b>stamp</b> 65:2	<b>statute</b> 159:16, 20
369:17 372:17	21 385:12 389:23	<b>stand</b> 87:19 167:20	162:10, 11, 18
380:11, 11, 15 406:2	399:8	172:20, 20 423:23	<b>statutes</b> 162:13
421:19 424:20 429:5	<b>specifically</b> 89:4	424:1, 9	<b>stay</b> 56:2, 19 169:11
	117:10 130:22		

<p>181:12 265:15 323:8  <b>staying</b> 54:23  <b>steal</b> 268:14 270:4  <b>stealing</b> 268:4  <b>stenographic</b> 5:21  91:7 325:22  <b>stenographically</b> 1:15  <b>step</b> 385:19, 20  388:24, 24  <b>steps</b> 136:10 142:4  172:17 380:4 384:16  <b>Steve</b> 45:15 69:20  <b>Steven</b> 45:11 69:14,  15  <b>stick</b> 86:1 88:22  421:3  <b>stipulate</b> 6:2  <b>stipulated</b> 5:1  <b>stipulations</b> 248:19  <b>stir</b> 417:10  <b>stock</b> 44:3  <b>stocks</b> 40:16  <b>stole</b> 264:24 266:21  268:10, 11, 15 272:4  274:23 278:5 279:7  280:7, 15  <b>stolen</b> 264:19 274:12,  16, 17 279:13, 17  281:1  <b>stood</b> 424:2  <b>stop</b> 18:19 19:24  20:2 23:1 28:5  31:16, 21 36:8  194:21 231:20 286:4,  9, 12 300:1 311:16  312:12, 13 318:2, 7,  17 323:21 329:7  330:9 332:11 358:16  359:3 399:15  <b>stopped</b> 261:17  336:17  <b>stopping</b> 52:10, 13  427:12  <b>stories</b> 74:22 75:3, 11,  15 151:9 172:15  309:8  <b>story</b> 80:11 86:22  92:14 96:19 151:22,  23 236:15 304:13  309:22 333:9, 12, 16</p>	<p><b>strange</b> 136:17  261:11  <b>strategy</b> 58:10  359:14, 15  <b>Street</b> 1:13 2:3, 9, 14  99:20  <b>stretched</b> 106:17  <b>strike</b> 12:19 78:3  99:2 116:20 120:16  154:3 156:14 166:11  179:5 189:10, 20  206:18 223:7 251:2  371:17 379:16  380:12  <b>striking</b> 174:15  <b>strong</b> 153:4  <b>structure</b> 47:21  49:20 50:8 69:2, 6,  12, 16 189:11  <b>stuck</b> 212:14  <b>stuff</b> 133:24 159:4  176:2 251:15 265:14  316:22 342:24  375:19 419:6  <b>stupid</b> 42:17, 18  <b>style</b> 15:9, 11 223:22  224:23 225:14, 22, 24  226:12, 23 227:6  <b>subject</b> 102:20  115:24 118:4 153:14  189:22 196:22  197:11 266:23 277:6  432:10  <b>subjected</b> 79:3 92:20  101:15 149:11, 14  154:5 177:23  <b>subjecting</b> 294:7  <b>subjects</b> 117:21  <b>submit</b> 241:8 376:5,  17, 20 377:21  <b>submitted</b> 148:12  150:9 377:13, 17  379:11  <b>Subscribed</b> 434:13  <b>subsequently</b> 247:20  262:8 291:8 333:15  <b>substance</b> 434:8  <b>substantial</b> 205:13  <b>substantive</b> 246:20</p>	<p><b>successful</b> 217:23  218:2 339:13  <b>successfully</b> 217:19  <b>sucks</b> 397:7  <b>sudden</b> 158:22 341:5  <b>suddenly</b> 341:6  <b>sue</b> 340:22  <b>sued</b> 273:8  <b>suffices</b> 88:8  <b>suggest</b> 57:13 58:17  412:17 420:24  <b>suggested</b> 58:4 90:13  229:13 262:14  <b>suggesting</b> 114:8  184:20 185:6  <b>suggestion</b> 90:7 91:21  <b>suggests</b> 92:10  <b>Suite</b> 2:4, 14  <b>sum</b> 390:10  <b>summary</b> 227:19  229:7  <b>Sunday</b> 189:20, 21  <b>supervise</b> 180:22  181:7, 13  <b>supervisee</b> 155:7, 12  305:20  <b>supervising</b> 180:10  <b>supervision</b> 431:7  <b>supervisor</b> 105:16, 18  154:13 155:7, 11  163:18 164:2 181:14,  17 225:11 271:11  305:20, 22  <b>supervisors</b> 181:6  <b>support</b> 92:4 424:10  <b>supposed</b> 22:7 36:17  170:3 334:5 341:13  346:20 350:9 378:23  379:19 385:4  <b>supposedly</b> 281:1  <b>sure</b> 7:17 13:22  25:10 50:11 51:8  56:3 57:3 67:3 79:1  97:9 104:15 112:2  122:1 123:22 125:10  129:14, 16 130:13  157:13 168:23 169:1,  2 183:2 189:14  199:4 217:10 231:15  242:1 250:22 252:24</p>	<p>275:19 280:20 289:7  301:1, 3 305:24  333:17, 19 346:20  355:8 374:11 381:16  382:21 399:23 400:6,  8, 10, 12, 14, 18, 22, 24  402:3 409:24 413:2  425:15  <b>surprise</b> 64:1 90:22  346:7 372:7  <b>surprised</b> 57:12  <b>surprises</b> 117:4  118:24 135:9 216:18  259:17 346:3  <b>surprising</b> 113:18  <b>suspicious</b> 182:10  <b>swear</b> 5:22 6:3  207:18  <b>sworn</b> 6:22 9:2  431:5 434:13  <b>sympathize</b> 363:10  <b>systematic</b> 124:16, 17</p> <p>&lt; T &gt;  <b>table</b> 353:5  <b>tactics</b> 140:8  <b>take</b> 5:24 7:4, 7  32:24 33:1 36:12  38:14 51:13 55:10  56:17 57:5 58:1, 6  74:8 80:4 101:7  102:3 105:5 116:10  122:14 133:7, 9  135:16 140:1, 2  141:13, 17 142:4, 13  144:18 164:13  167:17 170:3 176:1,  7 191:8 201:1  217:16 218:9 223:3  230:10 231:22 232:2,  5, 9, 18 234:20  240:13 249:19  251:12 292:17  303:11, 13, 14 311:9  315:18 321:9 335:9  337:17 340:22  355:10 385:12, 19  386:15 387:1, 20, 23  421:1, 24 428:8</p>
---	--	--	---

<p><b>taken</b> 1:12 84:23 250:2, 4 251:4 280:10 287:13 288:8 289:4, 13, 24 290:11 388:17 389:1, 3 398:15, 17 431:4 <b>takers</b> 424:8 <b>takes</b> 77:14 <b>talk</b> 19:24 23:15 24:17 34:22 49:7 55:15 73:11 80:22 89:7 106:2 111:13 116:24 133:5 140:22, 24 141:3, 5 147:20 185:8, 11, 12 212:5 221:13 228:8 230:22 233:18 242:16 246:20 254:24 256:14 257:11 258:7, 21 265:4 271:11, 15, 18 285:2 290:7 293:4 297:23 302:12 346:14 397:24 428:5 <b>talked</b> 24:24 34:18 61:10 65:7 87:10 141:1 142:2, 2, 21, 24 208:9 209:3 233:22 242:23 246:21 289:13 313:21 345:14 388:1 393:6 395:21 397:16 <b>talking</b> 8:18, 19 15:6 17:20 23:18 91:7 94:12 110:4 124:1 138:13 139:18 142:17 149:2, 3 153:13 165:10 174:14 190:21 208:12 209:24 214:6 225:13, 23 226:11, 23 227:8 240:22 241:5 248:3 249:1 252:5 255:13 259:7 264:3 266:4 267:13 270:11 280:6, 9, 24 281:4 282:8, 9 290:10, 11 302:20 307:5, 7, 9 315:8 324:7 344:6, 11 345:21 353:16 356:19, 24 357:4, 10,</p>	<p>19, 19, 20 360:20 361:10, 19 371:10, 12 374:3 386:5 397:11 406:19 416:8 429:3 <b>talks</b> 228:21, 24 229:1 293:10, 11 <b>tank</b> 339:21 <b>tape</b> 79:16 <b>targets</b> 128:5 <b>task</b> 28:22 <b>tasks</b> 54:9 340:3 375:9 <b>tax</b> 11:20 <b>taxable</b> 425:23 <b>tax-deductible</b> 425:7, 19 <b>team</b> 194:10 <b>tech</b> 414:19 <b>technology</b> 29:3 35:24 <b>Telegram</b> 413:18 <b>Telegrams</b> 142:22 <b>telephone</b> 57:1 254:22 338:1 <b>television</b> 208:20 269:7 <b>tell</b> 11:23 19:11 32:18, 18 35:18 44:15, 16 54:16 55:9, 19 60:9 68:11 72:22 74:20 77:21 80:10, 10 85:20 86:15 88:16 96:18 98:2 105:9 109:18 117:16 129:15 135:12 142:10 143:21, 23 145:21, 24 146:5, 11 151:23 154:14 167:13, 18 168:13 169:3, 10 175:10 181:18 182:4 183:16 191:9 192:14 195:9 196:9 199:16 204:4 222:7 240:6 241:11 244:21 246:10 256:16 257:6, 21 258:8 262:14 272:6 273:2 274:13 278:12 283:5 285:17 290:8 291:6, 7, 19 294:17</p>	<p>300:4 308:23 311:9 312:11, 23 315:12 316:20 318:2, 6, 16 331:20 332:1 334:22, 24 335:1 340:10 341:1 363:1 370:18 374:21 377:17 383:3, 9 388:5, 18, 20 389:5, 6, 7, 9 431:5 <b>telling</b> 18:1 36:8 56:16 74:21 136:24 143:18 182:19 188:5 190:24 258:21 290:12, 16 292:2 301:16 308:10 338:17 347:10 375:19 393:10 394:7 408:19, 20 412:13 419:12 426:22 <b>tells</b> 159:5 170:1 219:14 320:2 418:24 <b>ten</b> 101:21 104:20, 21 125:2 145:5 212:6 238:22 298:20, 22 299:5, 9, 11, 20 300:2, 3, 3, 5, 17, 21, 23 <b>tense</b> 356:17, 20, 24 357:5, 10 358:18, 20, 23 359:5 360:21 361:2, 7, 12, 13 <b>tension</b> 362:11, 13 <b>term</b> 162:14 <b>terminated</b> 108:15 110:3 <b>termination</b> 235:2 <b>terms</b> 106:3 249:8, 11 335:3 <b>terrible</b> 258:18 349:16 351:2 <b>testified</b> 6:22 13:22 34:23 87:22 100:10 112:16 141:15 165:13 192:16 251:20 308:19 319:20 356:6 367:2 379:4 392:2 <b>testify</b> 89:8 167:13 208:1 277:3, 7 282:22 292:22, 24</p>	<p>304:14 305:18 333:22 341:2 <b>testifying</b> 61:2 112:15 170:9 386:9 387:17 398:21, 24 400:13 <b>testimonies</b> 177:9 <b>Testimony</b> 3:3 15:3, 21 24:1 33:10 35:9 47:7 66:7 69:5, 16 70:7 83:11 90:6, 11 92:24 102:16 134:5 157:7 193:4 197:8 201:20 206:15, 17 207:6, 12 210:3 212:12 214:3 263:11 269:15 275:5 278:24 283:24 291:21 306:19, 22, 24 312:15 333:17 344:8 377:6 388:15 431:4, 6, 8 <b>Text</b> 4:18 106:7 108:19 173:20, 22 174:1, 4, 15, 17 210:22 211:4 274:13 280:13, 22, 23 281:3, 8, 11 381:23 428:2 <b>texting</b> 413:18 <b>texts</b> 175:11 274:9 280:3, 6 370:17 385:15 389:22 390:17 397:23 <b>Thank</b> 6:19 37:6 58:21, 22, 23 102:1 122:3 187:7 190:1, 13 216:11 225:18 242:11 249:16 259:23 264:17 300:20 319:22 335:12 336:19 352:21 361:14 365:8 374:22 385:10 415:8 429:21 <b>Thanks</b> 57:4 101:23 147:7 384:9 417:5 <b>theft</b> 269:23 270:15, 16 271:22 272:10 274:6 <b>Thelma</b> 104:9</p>
--	---	---	---



233:18 254:16  
**theory** 41:21  
**thereof** 431:9  
**thing** 7:18 8:9 32:8  
 52:2 56:3 96:2  
 126:16 134:20  
 138:13 141:23 152:5  
 172:4, 21 173:4  
 174:15 192:16 200:1  
 220:18, 19 255:21  
 262:7 288:15, 19  
 309:7, 24 313:4  
 323:9 332:4 333:14,  
 15, 23 353:22 355:9  
 362:9 365:6 368:15  
 369:21 370:21, 22  
 402:4 423:17  
**things** 28:23 36:18  
 37:24 53:23 80:3  
 83:14 117:1, 3  
 119:21, 22 124:7  
 129:6 131:7 153:22  
 155:2 159:10 160:6  
 161:18 169:24  
 170:23 173:5 180:15  
 181:10 210:7 211:15,  
 16 212:20 215:17  
 219:24 230:24 231:2,  
 5 234:6 240:8  
 243:12 272:17  
 280:20 308:21  
 309:14 313:11, 18  
 327:2 333:4, 8 341:9,  
 14 342:18, 18, 19, 20  
 351:2 362:3 375:22  
 376:1 388:9, 12  
 417:14  
**thing's** 209:11  
**think** 7:12 8:17  
 14:13 25:9 26:4  
 30:18 31:17, 17  
 44:15 50:3, 5 63:8  
 74:2 75:16 81:18  
 83:5, 10 85:18, 21  
 86:3, 5, 16 87:7, 20,  
 21 88:15, 17 90:16  
 91:14, 19 94:22  
 97:22 101:13 103:13  
 104:11, 21 110:13  
 113:15 116:1 117:24

119:20 127:1 128:7  
 129:6 136:6, 22, 23  
 138:3, 12 139:9  
 141:2, 20 142:11  
 144:16, 17 146:13  
 147:23 148:23 149:1  
 160:11 166:10, 12  
 167:3 169:5 172:12,  
 23 178:15 181:19  
 183:23 184:7 187:2  
 189:18 190:11  
 199:21 201:6, 9  
 217:17 218:21 219:1  
 227:5 228:7 234:1  
 238:20 239:3, 9, 19,  
 20 240:6, 7 243:10  
 244:16 245:5, 23  
 246:6, 8 249:2  
 250:17 252:5 253:13  
 259:2, 24 264:18, 23  
 265:6 266:2, 15, 21  
 268:5, 7, 10 269:11  
 273:1, 3, 11 274:3, 8  
 277:2, 4 278:5  
 288:22 301:15, 19, 19,  
 24 306:2 308:16  
 309:19 313:18, 20  
 314:22, 24 315:1  
 319:20 339:21  
 341:16 342:16  
 344:11 345:2, 21  
 349:3 359:8 361:9,  
 17, 17, 19 366:13  
 373:22 375:17 376:2,  
 2 380:7 389:23  
 390:6 395:9 401:14  
 408:1 410:11 412:18  
 414:13 416:8, 22  
 419:1, 8, 16, 17, 24  
 420:23 421:10 427:1  
**thinking** 128:20  
 191:16 350:14  
**Third** 43:11 109:10  
 162:23 200:5 201:4  
 206:10 333:16  
**Thirdly** 400:18  
**thirty** 432:15  
**this'** 276:17  
**this-and-that** 309:16

**Thomas** 272:13  
 275:1, 2 277:22  
 278:14 279:6, 20  
 280:13, 14, 23 389:10,  
 12  
**thoroughly** 95:12  
**thought** 19:10 84:3  
 95:4 107:19, 21  
 109:7 126:7 127:11,  
 17 129:7 143:24  
 144:1, 2, 4 158:17  
 201:16 202:13 209:3  
 261:21 270:10  
 272:22 291:11 303:5  
 307:1 336:13 342:15  
 378:14 406:19 407:7  
 417:16  
**thoughts** 374:22  
 421:22  
**thousand** 12:11 98:9,  
 23 410:24  
**threat** 261:10, 14, 23,  
 24 262:4, 5  
**threaten** 260:5 261:7  
**threatened** 23:1  
 228:19  
**threatening** 31:23  
 194:21  
**threatens** 229:2  
**three** 23:1 129:2  
 145:1 153:17 156:23  
 164:9 170:19 176:13  
 184:12 190:6, 19  
 193:12 199:8, 24  
 200:3 203:23 206:4  
 211:6 213:18 214:7  
 222:18 262:16, 17  
 298:19 337:5, 9  
 339:7 390:11 410:12  
 411:1  
**threes** 21:2  
**three-something** 98:7  
**threw** 312:10 371:2  
**throat** 228:17, 19  
**throats** 229:2  
**thrown** 313:19  
**Tiffany** 70:13 108:3,  
 14, 20 109:4, 20, 22  
 113:20 298:16

**till** 94:12 141:19  
 221:14  
**time** 5:5, 10 8:19, 19  
 21:7, 11, 18 30:2, 13,  
 16 37:5, 6 39:14  
 47:12 52:6 57:6, 11  
 58:1, 6, 20 59:18  
 60:24, 24 62:10  
 71:22 79:10 82:22  
 84:13, 16 90:3 94:11,  
 24 99:19 102:10, 11  
 107:20, 21 112:4, 17,  
 22 115:2 117:22  
 119:21 128:20  
 130:11, 20 133:17, 21,  
 23 137:12 138:11  
 144:22 145:11, 18  
 161:17 163:7 164:7,  
 8 168:12 169:6, 9  
 172:14 173:14 174:2  
 175:14 181:12, 15  
 182:20 192:6, 7  
 193:10 195:4 198:2,  
 9 201:5, 11 202:3, 4  
 204:5 205:12 206:17  
 208:3 209:8 211:5  
 215:24 218:18 221:5  
 223:4, 13 226:1  
 231:19 242:1 249:15  
 250:18 255:1 261:1,  
 3 285:4, 13, 17  
 287:12, 20, 20, 22  
 289:4, 6 291:5  
 296:16 307:9 310:2  
 311:9, 10 313:22  
 314:16 316:5, 7, 13,  
 14, 21 317:9 318:2  
 323:22 335:16 347:7,  
 16 348:9 353:17  
 354:24 359:12 360:5  
 371:15 373:11 374:4  
 382:19 390:8, 19  
 391:2 394:15 403:10  
 409:23 410:5 412:10  
 419:3, 22 420:8, 24  
 427:7 429:19, 20  
 431:5  
**timeline** 284:24  
**timeliness** 417:18  
**timely** 135:21

<p><b>times</b> 23:1 49:7 70:10 115:4, 6, 23 210:14 229:23 273:20 321:1 345:6 428:14 <b>time's</b> 415:5 <b>tissue</b> 92:16 99:8 138:4, 7, 8 <b>title</b> 46:7, 8 47:19, 20, 23 48:3 49:18, 20 50:5, 10 51:3 130:12 273:21 365:21 <b>today</b> 5:18, 20 7:4, 7, 19, 24 8:12, 14, 17, 24 19:18 22:6, 10, 18, 18 23:5 35:24 55:15 57:6 58:12 72:3, 8, 10 73:4 81:3 87:19, 19 133:1, 6, 12 150:24 151:7, 10 169:7 185:17 187:24 192:16 203:11 216:16 218:1 229:23 235:9 238:21 239:9 270:10 273:20 290:7 291:21 319:21 333:22 352:12 358:3 359:12 383:3, 5, 6, 9 386:1 387:8, 17 390:16 395:11 398:24 415:16 416:4 420:10 <b>Today's</b> 5:9 <b>told</b> 33:6, 19 46:3 68:19 79:23 87:9 88:9 98:3 99:23 100:23 106:6, 12 117:3, 12 118:22 129:11 130:24 135:2 138:24 151:21 153:20 155:1 164:21 168:16 172:6 173:5, 8, 14 175:6 184:3 193:2, 9, 18 198:20 199:17 200:8, 9 228:18, 18 230:24 237:5 244:17, 17 251:7, 9 256:12 258:16 266:6 272:15 275:4 304:13 308:3</p>	<p>313:11 314:3, 10 318:22 319:17 320:21 321:1 333:13 334:17 345:14 349:16 354:20 373:9 392:2 394:12, 17 395:3 398:22 403:3 406:14, 15, 18 407:1, 8, 10, 21 428:4, 7 <b>Tommy</b> 267:13 279:21 285:4, 10 286:3, 17 287:3, 11 289:16 316:21 373:5, 12 374:7 <b>tomorrow</b> 90:24 332:12 395:9 <b>tooth</b> 160:14 <b>top</b> 21:3 63:22 119:14 127:6 248:22 271:6 381:18 <b>topic</b> 96:15 209:16 313:7 390:16 408:13 <b>topics</b> 184:14 <b>total</b> 416:3 <b>totally</b> 29:20 271:23 386:22 <b>touch</b> 96:17 159:6 349:15, 19 <b>touched</b> 96:5 <b>touching</b> 174:16 <b>tough</b> 114:18 115:8 116:1 137:13 175:14, 15 250:18 <b>toxic</b> 126:10 127:21 <b>tracing</b> 419:3 <b>track</b> 309:14 <b>trade</b> 75:10, 15 151:9 261:19 264:22, 23 268:19, 22 269:17, 24 270:15 271:21 272:17 <b>traded</b> 138:15 <b>trading</b> 137:1 <b>trafficking</b> 159:9, 11, 12, 19 160:1 162:10, 13, 15 163:5 <b>train</b> 201:16 <b>transcribed</b> 431:7 <b>transcript</b> 30:22 277:10 432:16, 17</p>	<p><b>transcription</b> 431:7 434:5 <b>trap</b> 284:14 <b>trapped</b> 284:11, 20 <b>travels</b> 346:7, 9 <b>treasurer</b> 67:21 <b>treat</b> 115:4 116:2 <b>trespassed</b> 94:8 <b>trial</b> 5:6 <b>Tricia</b> 92:4, 12 96:9, 15 131:24 132:4 139:20, 22 140:2 159:4 192:13 203:19 208:10, 10 211:13 219:22 220:17 222:17 227:13 242:24 251:20 292:15 293:1 298:9 308:22 309:4, 17, 19 312:5, 16, 21 313:8 333:3 336:11 339:9 340:21, 23 341:9, 14 343:8 370:2, 21 371:2 385:3 418:7 420:5, 6 <b>Tricia's</b> 228:14 256:17 <b>trick</b> 21:17 <b>tried</b> 81:1, 5 96:17 143:14 151:8 159:6 268:2 307:12 309:4 312:11, 24 350:5 <b>trigger</b> 87:9 <b>trip</b> 94:21 106:6 169:16, 16 182:1, 3 190:23 191:6 371:17 <b>trouble</b> 372:10, 11, 21, 24, 24 373:2 375:17 <b>troubled</b> 390:20, 22 391:5, 17 393:7 394:13 395:4 <b>trouble's</b> 372:23 <b>troubling</b> 219:19 224:3, 21 227:2 277:2 406:15 <b>true</b> 73:22 91:14 143:18 203:8 212:12 213:13, 13 245:2 264:13 298:21 299:5 308:1 314:11, 11</p>	<p>315:4, 4 346:24 380:22 382:5 431:8 <b>truly</b> 313:10 <b>Trust</b> 134:6 <b>truth</b> 76:20 194:2 199:23 200:2 222:7 308:23 310:20 337:14 431:5, 6, 6 <b>truthful</b> 9:4 <b>truthfully</b> 72:12 <b>try</b> 8:23 20:6 21:19 31:23 49:7 57:18 78:17 102:15 162:17 165:13 167:12 172:13 200:6 210:1 236:4 258:6 267:5 297:22 299:4 306:15 309:3 344:17 360:6 417:14 <b>trying</b> 8:5 58:7 175:23 176:24 179:20 193:13 210:6 226:13, 19 236:13 244:16 249:2, 10 265:21 270:9 330:12, 14 338:11 343:1, 8 351:22 360:1 367:8, 9 388:14, 22 <b>Tuesday</b> 1:6 5:9 375:12 <b>Turn</b> 35:17 53:10 97:4, 5 112:7 119:7 125:19, 24 398:20 401:8 <b>turned</b> 53:13, 16, 18 54:3 64:17 65:4 75:19 95:13 401:11 <b>turning</b> 53:24 110:7 <b>turns</b> 109:15 <b>TV</b> 269:12 428:13 <b>Twenty-six</b> 9:14 <b>twice</b> 260:22 427:18 <b>two</b> 12:11 20:14, 20 21:1 45:12 57:8 60:19 61:15, 18, 22 62:3, 10, 13 96:22 99:6, 24 109:10 114:13 115:5, 6 117:3, 6 120:8 124:3 128:4, 16 129:7</p>
---	---	--	--

136:18 163:11 172:1  
 174:8 180:8 183:4  
 190:24 199:6 200:4  
 201:23 206:3, 11  
 215:17 242:16  
 251:10 262:2 265:20,  
 20 295:17 298:19  
 303:11 304:7 311:22,  
 23 348:24 362:3  
 367:15, 21, 22 384:3,  
 4 401:19 404:10, 17  
 411:1 417:23  
**type** 10:12, 20 12:2  
 21:10  
**types** 11:6

< U >  
**ugliness** 342:23  
**uh-huhs** 8:2  
**uh-uhs,** 8:2  
**UK** 319:18 346:9  
**ultimate** 29:6 32:24  
 163:21 328:7, 12  
**ultimately** 91:16  
**unable** 310:20  
**unacceptable** 288:17  
**unauthorized** 379:16  
**unaware** 33:2 309:11  
**unbearable** 233:20  
**unchanged** 366:6  
 375:10  
**unclear** 209:9  
**uncomfortable** 173:24  
 174:13 244:4 347:5  
**underneath** 15:13  
 63:15 193:21 195:20  
 196:2, 2  
**underpinnings** 29:1  
**understand** 8:12 9:5  
 17:11 22:3, 7 25:9  
 116:7 127:3 128:15  
 134:5 135:4, 7  
 153:16 154:8, 12, 24  
 171:3, 11 176:24  
 196:1, 22, 24 273:19  
 274:1 277:9 294:20  
 295:20 348:13, 14  
 363:9 425:1, 24

**understanding** 46:1  
 252:19 294:12, 17  
 376:9  
**understands** 180:8, 8  
 422:12  
**understood** 8:11  
 93:11 116:6 134:23  
 220:1 352:24  
**undertaking** 87:14  
 88:9  
**underway** 261:15  
**uneasy** 174:18, 22  
**unendingly** 385:10, 16  
**unfair** 58:10  
**Unfortunately** 56:24  
**unhappy** 109:14  
 119:6 150:18 194:10,  
 11, 11 213:19, 21  
**unilaterally** 92:8  
 263:12  
**unintelligible** 266:2  
 273:22 299:14  
 328:16 346:3 367:2  
 372:7 382:12 383:12,  
 23 386:9  
**UNITED** 1:1 5:13  
 159:13, 14  
**universe** 382:20  
**unknown** 79:16, 17  
 119:13  
**unlawful** 101:15  
**unpleasant** 126:4  
**unquote** 95:7 170:3  
 220:12 328:12  
**unquoted** 95:8  
**unrelated** 406:18  
 407:9, 14 408:4  
**untrustworthy** 92:24  
**unwanted** 176:14, 19  
 179:6 188:1, 7, 17, 20  
**unwelcome** 154:22  
 179:5 372:8  
**ups** 308:17  
**upset** 136:22, 23  
 163:19 168:13  
 301:15, 18 302:19  
 304:9 320:13, 13  
 343:8 374:6, 6  
**use** 81:17 90:13  
 91:24 92:1 108:19

253:12, 19 262:11  
 267:22 288:20  
 322:22 428:12, 13  
**useful** 12:14 261:21  
**usual** 321:21 378:2  
**usurpers'** 340:8

< V >  
**vagina** 194:13  
 195:12, 21 196:1  
**vague** 351:2 400:20  
**valid** 174:18 252:16  
**value** 172:16 173:16  
 174:6, 8 200:23  
 201:1, 2 202:4, 16  
 210:4, 11, 19 211:4, 7  
**variable** 203:17  
**various** 33:6 249:13  
 315:1 379:14  
**vehicle** 164:9  
**veracity** 80:15 261:24  
**verb** 253:11  
**verbal** 8:1 349:5  
**verbs** 262:13  
**verified** 6:5 61:11  
 63:20  
**verify** 56:12  
**verse** 56:8, 9 108:12  
 202:2  
**version** 92:10 284:20  
 337:12  
**versions** 199:24 200:4  
**versus** 5:12  
**vice** 67:20, 21  
**victim** 159:1  
**video** 5:11, 17 81:14,  
 16 233:11 278:19  
**videoconference** 6:4  
**Videographer** 2:18  
 5:8 36:23 37:5  
 55:24 56:3 102:4, 10  
 120:24 121:8, 15, 18,  
 21 122:2, 5 144:22  
 145:11, 17 191:24  
 192:6 242:5, 11  
 315:21 316:7, 13  
 323:15 353:20 365:3,  
 8, 14 415:6, 9 429:19  
**Videotaped** 1:11

**views** 126:4 213:14  
 269:4  
**VII** 273:21  
**vindictive** 194:7  
**violate** 217:11  
**violated** 273:21 274:4  
**violating** 273:24  
**violation** 273:12, 15  
**viper's** 342:15, 22  
**virtually** 313:6  
**virtues** 225:15  
**vis-à-vis** 114:20 116:5  
**visit** 90:1  
**visited** 105:7  
**vituperation** 113:17  
**voice** 36:4 175:22  
**volatile** 194:7  
**volunteer** 286:22  
**voyeur** 114:5  
**vs** 1:5 7:5  
**vulgarity** 309:10  
 342:23

< W >  
**W-2** 297:8  
**Wait** 95:16, 16  
 120:21 171:22, 23  
 182:5 190:21 195:1,  
 6 221:14 242:22  
 249:18 369:24, 24  
**waited** 172:14  
 173:15 182:9  
**waiting** 182:12 195:3  
**waive** 405:18, 19  
**waived** 5:3  
**walk** 325:8  
**walking** 394:5  
**wall** 143:14 307:13  
**wandered** 217:20  
**wanna** 30:13 31:12  
 32:11, 11, 14, 15  
 47:15 49:12 51:6  
 52:9 55:15, 18 57:18,  
 18 59:5, 19 72:22  
 76:21 81:17 88:23  
 123:16 124:5 134:5  
 162:24 163:3 164:20  
 176:7 191:13, 13  
 195:8 201:14 208:21  
 210:13, 18 224:10, 11

240:1 246:11, 16	<b>warranted</b> 218:22	357:22 374:15	255:13 256:9, 14, 22
262:6 265:17 269:17	219:1	406:14	257:19 259:6 262:10
275:18 281:23	<b>wary</b> 375:15	<b>weekly</b> 219:20 227:3	263:18 266:23 268:1
292:17 300:2 303:12	<b>Washington</b> 71:14	<b>weeks</b> 262:2 307:16	272:6 273:8 274:13
314:7, 17 321:9	74:1, 9, 21 151:7	323:2, 5 401:19	279:16 286:12
324:24 325:1 330:2,	345:22	<b>weigh</b> 417:5	291:11 293:3 294:5,
6 332:17 333:17	<b>waste</b> 107:20 397:3	<b>weird</b> 95:4	17 296:14 297:14
334:22 344:24 358:9	<b>wasting</b> 21:11, 18	<b>weirded</b> 174:13	301:4, 13 302:24
381:19 389:5 392:18	52:6 107:21 359:12	<b>welcome</b> 256:16	303:10 306:4 307:8
393:14 396:11	<b>watch</b> 387:13	300:20 408:19 410:2,	308:9 309:23 311:16
416:23 427:9	<b>watched</b> 7:12 207:19	3 412:7 415:22	315:17 318:6, 14, 15
<b>want</b> 7:21 17:9	251:14	<b>welcoming</b> 135:15	332:4 333:11 340:7,
30:17 32:18 50:15	<b>watching</b> 105:19	<b>welfare</b> 217:14 298:7	24 346:2 350:21
51:7, 14 52:21 55:4,	<b>wax</b> 335:19	<b>well</b> 6:19 16:14 17:9	359:21 362:4 363:2
19 59:4 84:1 85:5	<b>waxing</b> 315:16	19:19, 21 21:5 23:14	366:8, 11 370:8
87:5, 8 88:15 90:13	<b>way</b> 12:15 14:6	25:10 33:12 34:23	372:19 373:22 376:9,
98:2 126:14 127:12	19:21 20:11 29:8	35:12, 15 38:9, 18	20 377:2 378:3, 17
144:24 164:19 168:6	35:19 48:16, 17 60:7	39:14, 22 41:4 42:10,	381:20, 24 383:2, 7
177:18 181:11 185:4	65:20 77:19 101:13	23 43:6 44:7 46:1, 5	387:11 388:2, 24
191:16 195:9 212:8	102:13 109:4 114:11	49:24 50:3, 5, 12	389:10, 23 393:16
213:15 223:9 230:14	116:2 119:16 124:16,	53:9, 15 54:16 61:11,	396:18 403:5, 9
233:1 238:4 246:12,	17 125:4 131:13	17 62:5 63:20 64:5	404:15 411:6, 18
23 247:11, 24 252:1	137:14 143:13 158:3	66:16 68:10, 14	415:17, 24 418:16
271:20 282:16	163:10 212:10	69:20 71:12 73:11	419:18 420:9 422:23
283:14 285:12	217:22 220:10	79:12 80:8 82:5, 9,	427:1 429:12
293:24 299:22	228:20, 24 235:3	11 84:14 85:20, 24	<b>went</b> 54:14, 15 60:13
303:10 329:14	238:22 269:16	86:2 99:13 109:19	102:16 108:15
340:13 344:7 349:10	299:22 313:24	112:3 114:6, 14	127:15, 17 162:20
351:19 359:21, 23	329:15 330:2, 7	120:4 123:6, 19	163:6, 7 169:17
370:12 381:14 385:4	338:12 344:23	126:17, 20, 22 127:1,	173:8 180:13, 14
396:15 415:16	349:24 350:17, 18	24 128:4 129:15	199:15 223:17 233:1,
<b>wanted</b> 73:6 92:4	353:9 354:24 356:18	130:10 132:17 133:1,	22, 24 251:13 261:12
107:16 110:24 127:3	357:11, 13, 14 359:8	4 135:2 136:8, 20	289:20 291:6 297:15
140:4, 5, 6 141:5	378:2 399:4 404:4	138:11 143:12 147:8	307:17, 22 312:24
166:1 171:18 174:23	414:18, 20 424:14	148:1 149:10 150:6	339:7 340:16 350:1
183:11 219:6 228:13	425:13	154:18 155:20	357:22 404:6 428:14
247:9 250:5 259:17	<b>ways</b> 181:10 260:3	158:23 160:6 162:16	<b>we're</b> 7:4, 7, 19 8:4,
265:17 308:18	313:10, 16, 17, 17	163:13 165:5, 24	10 18:10 21:11, 18
313:10, 23 314:1	337:24 367:23	166:24 169:6, 13	28:7 31:20 35:23, 24
323:24 324:2 335:3	377:19 379:14	172:4 173:2 177:13	36:11, 20 41:4 48:8
343:7 348:19 424:4	396:16	178:2, 8 179:13, 17	52:3, 5, 6, 8 54:20, 21,
<b>wants</b> 49:3 57:6	<b>web</b> 63:9	180:19 183:16 184:6	22 55:7, 9, 12, 14
58:6 59:1 109:17	<b>website</b> 62:23 63:2	185:16 187:6 189:3,	56:7, 10, 13 57:7, 10
170:14 175:4, 6	64:3 121:10, 17	9 190:13 192:23	61:3 73:11 74:11
186:10, 10, 18, 19	417:7	194:6 201:6 206:11	81:15, 16 101:7
224:19 237:11	<b>week</b> 131:15 141:18,	208:8 222:19 228:15	124:1 134:15, 16
314:10 364:21	21 142:1, 12, 13, 14,	230:9, 15 234:10	138:12 145:3, 4
375:17, 23 416:11	16 143:10 150:20	235:1, 9 239:10	152:12 153:13
418:7	152:22 185:2 187:22	245:1, 12 246:8, 14	160:13, 13 167:1
	229:18 340:17	249:5, 8 254:5	175:23 177:17 195:1,



<p>3 196:6 214:6  223:15, 15 224:12  240:22 242:4 244:13,  23 248:6 251:18  252:5 265:23 271:15  278:19 292:6 293:4  311:8 323:8, 12, 13,  19, 22 324:4, 5, 22, 23  325:7 330:9 332:11,  11 335:18 345:9, 12  346:20 353:20, 22  359:1, 10 362:9  365:6 368:15 371:3,  8 374:19 387:6, 17  390:11 394:6, 7, 7  395:8, 19 397:6  401:23 402:5, 13, 20,  21 403:3, 7 404:15  415:11, 13, 13, 18, 20  423:20 425:12 427:4,  6, 6, 12  <b>we've</b> 30:20 117:20  319:20 352:8 354:15  385:15 388:1 398:17  420:9  <b>What'd</b> 324:1 421:9  426:11, 17  <b>What're</b> 17:20 266:4  386:5  <b>WhatsApp</b> 413:18  <b>WhatsApps</b> 142:23  <b>whatsoever</b> 96:23  108:21 183:5 261:14  423:9  <b>when's</b> 39:14 117:22  <b>Where'd</b> 138:6, 8, 9  411:6  <b>whipped</b> 151:24  <b>whisper</b> 69:23  <b>whispering</b> 36:2  193:16 212:20  <b>white</b> 177:11, 14  284:21  <b>whitewashed</b> 86:21  <b>wholesale</b> 258:20  <b>wholly</b> 422:10  <b>who've</b> 77:24  <b>why'd</b> 347:23  <b>wife</b> 311:17 329:8  <b>WILLIAM</b> 2:13 6:17</p>	<p><b>willing</b> 98:21 99:3  240:10 241:11  <b>willingness</b> 123:8  <b>willy-nilly</b> 427:12  <b>window</b> 223:18  <b>wink</b> 276:15  <b>wish</b> 15:8 203:6  212:4 222:2 255:1  335:9 356:21 372:21  374:5  <b>wished</b> 76:11  <b>wishes</b> 289:17  <b>withdraw</b> 224:3, 18  326:10 392:7 394:10  <b>withdrawing</b> 61:4  224:16 325:10  326:11  <b>withdrew</b> 224:8  394:20  <b>witness</b> 5:22 6:3, 5,  15 10:23 13:19 14:5,  22 16:17 17:3, 6, 19,  23 18:22 20:8, 24  21:15, 21, 24 22:13  24:3 25:17 27:12  28:11 30:16 31:6  33:15 35:21 36:3  37:24 38:16 40:20  47:3, 17, 19 48:6  49:14 51:18 52:11  55:5, 19 56:11 57:24  60:4 61:5 62:2 68:2  71:16 73:1, 15 75:2  76:14 77:2 78:7, 13  79:5, 8 81:10 82:24  84:9 88:2 89:20  90:21 91:24 93:8  99:10 100:6, 19  103:3 106:12 107:18  108:7, 14 111:19  112:16 115:16  118:19 123:22 125:8  128:10 130:1, 22  131:6 132:20 133:14  134:7 137:3, 14  139:13 141:5 144:8,  16 146:2, 8, 17, 22  147:3, 16 149:8, 18  150:4 151:4 152:12  153:16, 24 156:6</p>	<p>157:9, 18 158:13  159:24 161:6, 13  162:2 164:24 165:10,  20 167:3, 21 171:6  173:13 175:17 177:3  178:19 181:3, 22  184:12 185:11, 20  186:2 188:12 190:18  191:23 196:19 197:3,  10 200:17 201:22  202:10 203:1 205:13  206:8 207:16, 22  208:8, 13, 15, 17, 24  209:2, 12, 12, 13  210:10 211:20 214:5,  12 215:5 217:6  219:20 221:13, 17  226:17 228:11 229:5  231:4 233:22 234:23  235:5, 12, 18 237:8  239:1, 15 244:8, 10  245:3 246:3, 14, 17  247:3 248:7 255:19  257:9, 17 258:14  259:15 260:8, 12  263:2, 20 269:2  271:7, 9 273:5  277:15 278:3, 12  280:9 283:4 284:11  285:6 287:1, 22  288:3 290:20 291:4  296:9 297:10 298:6  299:18 303:7, 20  304:22 305:4, 10  306:2 307:22 310:16  311:12 319:3, 15  322:14 323:1 327:2,  10, 20 329:7, 17, 24  331:15 332:13 334:2,  11, 20 335:8 337:17  342:6 343:24 344:8  345:6 346:18 348:1  356:2, 10 361:6  367:14 369:9, 15, 21  374:15 376:16 378:9  382:22 384:24  385:13, 14, 17 386:15  387:1, 20 388:17, 24  389:2, 3, 11 391:15  392:9, 12, 17 397:9</p>	<p>405:5, 9 406:22  410:11 411:15  416:11, 17 426:12, 17,  19 429:23 431:8, 11  432:1  <b>witnessed</b> 116:4  194:5 227:3 349:8  <b>witnesses</b> 393:7, 15  395:21, 23 398:11  <b>Wolson</b> 18:10 41:5  54:24 160:23 195:9  196:9  <b>Wolson's</b> 56:4  <b>woman</b> 189:4  <b>woman's</b> 194:13  195:11 196:1  <b>women</b> 85:12 92:20  93:3 116:22 134:24  135:19 147:5 156:10,  15, 20, 22 157:13  171:4 176:13, 19  179:4 183:13 210:2  217:11 242:16 244:4  245:24 294:7 295:9  298:20, 22 299:11, 13,  20 300:17 303:7, 12,  15, 22 366:20  <b>women's</b> 234:9 299:5  300:23 368:8  <b>Wonder</b> 159:8  <b>wonderful</b> 131:12  <b>wondering</b> 100:8  334:6  <b>Wood</b> 9:19, 21, 24  <b>word</b> 90:13 92:1, 1  115:12 128:13  136:19, 19, 21 153:4  212:1 253:12, 19  262:11 288:20 310:2,  10, 11, 17 311:10, 19,  20 322:22 326:21  380:4  <b>wording</b> 97:19  <b>words</b> 12:18 159:18  170:19 174:21  220:11 222:15 276:8  311:2 350:22 375:1  425:4  <b>work</b> 9:10 10:1 12:3,  7 13:15, 24 18:5</p>
--	--	--	---

19:21 20:18 33:23  
 34:16 35:9 39:7  
 65:19 70:10, 13, 16  
 75:7 78:5 79:2  
 85:15 97:4, 8 109:19  
 111:14 123:8, 11, 16  
 133:18, 22 134:16  
 156:10, 16 162:21  
 163:5 165:16, 16, 17  
 179:5 180:11 183:11  
 186:17 217:12 238:1  
 249:21 266:16 285:3,  
 10 286:5, 22 289:5  
 300:16, 21 309:9  
 312:12 316:21 317:8  
 333:1 334:9, 22  
 338:7, 10 343:1  
 347:7, 11, 20 362:18,  
 19 364:5, 8, 12, 16  
 374:3 375:1, 3, 6  
 377:16 394:14  
 403:14 412:4, 8, 19  
 413:1 414:18 417:11  
 420:3 421:24 422:1  
**worked** 9:12 33:22,  
 24 34:3 43:23 69:20  
 70:8 77:24 142:5  
 143:7 266:17 298:8  
 342:4 412:12  
**working** 17:16 24:11,  
 19 34:6, 7 40:12  
 70:2, 4, 6 115:10  
 123:14 124:20, 24  
 184:7 225:5 249:6  
 286:2 289:16 347:9  
 348:18 349:10  
 365:18 412:5 414:15  
 421:5  
**workplace** 117:19  
 118:9 237:17 238:1,  
 9, 10 328:1 332:23  
 384:12  
**work-related** 376:11  
**works** 19:20 27:20  
 35:1, 3 48:16, 18  
 52:19, 20 145:10  
 191:21 239:20  
 243:20 318:14  
 329:15 404:4

**workshops** 117:20, 23  
**world** 104:23 236:7  
**worried** 146:19  
 198:12 243:6 288:8,  
 12, 20, 24 290:22  
**worries** 194:6  
**worry** 194:6  
**worse** 301:21  
**worth** 40:18 41:10,  
 14 42:14, 20 94:19  
 98:24  
**would've** 73:21, 22  
 76:6, 11 132:12, 16  
 149:21 150:15  
 173:13 187:18  
 250:21 401:13  
**wrap** 193:13  
**wrapped** 205:3  
**wreck** 100:23  
**write** 188:4, 19  
 363:23  
**writes** 177:22 240:9  
 346:2  
**writing** 93:1 176:5,  
 10, 11 421:8, 9  
**written** 66:24, 24  
 115:5 118:9 129:3  
 148:11 150:8 199:2,  
 5 218:4 353:16  
 382:23  
**wrong** 63:8 97:20  
 117:5 136:2 141:8, 9  
 164:16, 17 180:16  
 181:6 198:16, 18, 19  
 234:6 266:15 279:8  
 295:5 303:4 307:1  
 320:6 321:13 337:8  
 408:7, 9  
**wrong,** 348:22  
**wrongly** 161:18  
**wrote** 95:3 143:3  
 169:14 175:10  
 188:19 189:19  
 239:16 262:9 333:14  
 336:4 348:15 402:1  
 422:9 423:15  
  
**< X >**  
**X'd** 126:18

**XX** 126:10, 11, 11, 11,  
 12  
  
**< Y >**  
**Yeah** 15:6 28:6, 8  
 38:12 39:19 42:8, 12  
 52:20 56:6 57:20, 21  
 58:16 65:16 68:19  
 69:4 74:14 84:3  
 96:11 97:12 100:12  
 101:18 111:10  
 114:16 116:7 120:4  
 121:5, 12, 12 123:1  
 125:23 142:10 145:7  
 151:16 174:17, 22  
 175:8, 12, 19 176:12  
 179:1 180:17, 21  
 181:21 190:10  
 191:18, 23 193:4, 9,  
 20 194:12 195:13  
 197:18 213:5 215:8  
 228:20 229:23 230:6  
 231:5 233:13 237:16,  
 22 241:14 245:3, 11  
 246:22 250:9 252:2,  
 16 260:1, 3 265:19  
 269:7 270:17 272:24  
 281:7 300:12 301:7,  
 8, 21 308:9 317:1  
 323:4 328:14 343:11  
 345:20 346:11  
 355:11, 17 358:7  
 365:20, 24 366:10  
 373:4, 5, 9 374:9, 13  
 380:8 381:1, 5, 9  
 384:9, 18 389:13  
 395:7 399:18 402:10,  
 23 407:10, 11 408:22  
 414:24 415:11, 24  
 419:5 421:10, 21  
 429:8, 15  
**year** 10:8 27:3  
 37:18 38:11, 14 70:2,  
 4, 6 94:23 118:6  
 314:3 361:23 363:5  
 368:3 370:24 372:22  
 403:12 410:24  
**yearly** 418:9  
**years** 9:14 10:5  
 38:1 40:14 62:14

70:8 93:13 112:24  
 114:13 124:3 128:16  
 129:7 174:8 180:8  
 199:6 201:23 237:12  
 251:10 308:16 384:3,  
 4 410:12 411:1, 1  
 417:23  
**yelling** 236:13  
**Yep** 40:10 44:1  
 51:10 63:13 123:3  
 124:10 176:4, 17  
 190:9 192:20 193:18  
 218:20 243:8, 15  
 253:4 272:24 292:11  
 293:9 316:19 320:1  
 363:20 366:1 371:21  
 380:21 417:4 419:14  
**yesterday** 178:23  
 242:17  
**Yonchek** 96:22  
 97:10 104:7 119:12  
 298:15 303:14  
**York** 60:21 62:9  
 158:20  
**Yup** 57:15 63:16  
 208:2 218:12 243:4  
 255:4 292:16 316:23  
 406:9  
  
**< Z >**  
**ZABROSKE** 2:18  
 5:16  
**Zero** 229:15  
**Zoom** 1:12 2:6, 11,  
 17 8:17  
**zooming** 314:13

**WORD LIST**

< \$ >	176 (1)	30 (5)	60 (5)
\$14 (3)	17th (4)	30,800,000-some (1)	63 (1)
\$1500 (2)	18 (10)	30th (1)	65 (2)
\$17 (1)	1835 (2)	31 (1)	6th (3)
\$200,000 (1)	189 (1)	316 (1)	< 7 >
\$240,000 (1)	18-year-old (2)	320 (1)	7 (2)
\$27,000 (6)	19 (5)	321 (1)	7,000 (1)
\$31 (12)	19103 (3)	33,000 (1)	7:00 (2)
\$31,000 (1)	1994 (3)	336 (1)	70 (1)
\$5,000 (3)	19-page (1)	34 (1)	75 (1)
\$7,000 (10)	19th (1)	345 (1)	7th (2)
\$7,500 (2)	1st (32)	347 (1)	< 8 >
	< 2 >	354 (1)	8 (1)
< 0 >	2 (3)	365 (1)	8th (3)
000027 (1)	2:10 (2)	368 (1)	< 9 >
0005 (1)	2:15 (1)	371 (1)	9:02 (1)
00060 (1)	2:19-cv-05030-GAM (2)	374 (2)	968 (3)
	2:49 (2)	379 (1)	975 (2)
< 1 >	20 (2)	< 4 >	976 (1)
1 (6)	2017 (3)	4 (25)	977 (1)
1:11 (2)	2018 (53)	4:49 (2)	978 (2)
1:21 (1)	2019 (47)	40 (1)	990 (4)
1:24 (2)	2020 (8)	406 (1)	9th (10)
10:08 (2)	207,000 (1)	408 (1)	
10:35 (1)	21 (1)	417 (1)	< A >
10:45 (2)	215-391-4790 (1)	428 (1)	a.m (15)
10th (9)	215-569-1999 (1)	45 (1)	ability (4)
11 (8)	215-665-2000 (1)	4th (6)	able (9)
11:20 (1)	218 (1)	< 5 >	abruptly (1)
11:31 (1)	22 (3)	5:08 (2)	absolutely (5)
11:34 (5)	23 (2)	50 (1)	abstract (1)
11:45 (3)	23rd (5)	500 (2)	abuse (4)
11:58 (1)	240,000 (1)	500-paragraph (1)	abused (3)
11th (6)	242 (1)	501 (46)	abusive (14)
12 (1)	24th (3)	51 (2)	accept (6)
12:10 (1)	25 (4)	515 (1)	acceptable (7)
12:15 (2)	251 (1)	52 (1)	accepted (3)
122 (1)	26 (6)	54 (1)	access (5)
12th (1)	275 (1)	5th (25)	accession (1)
13 (1)	28th (1)	< 6 >	accomplishments (1)
14 (3)	292 (1)	6 (2)	account (4)
14th (2)	2950 (1)	6:40 (1)	accountable (2)
15 (2)	29th (1)	6:50 (2)	accountant (7)
1500-dollar (1)	2nd (4)	6:53 (3)	accounting (6)
16 (1)	< 3 >	6:54 (1)	accounts (2)
1650 (2)	3 (21)	6:55 (2)	accurate (3)
17 (3)			

**accusation** (1)  
**accusations** (6)  
**accused** (6)  
**accuses** (1)  
**accusing** (3)  
**acknowledge** (2)  
**acknowledged** (3)  
**acknowledges** (2)  
**acknowledging** (3)  
**ACKNOWLEDGMENT** (1)  
**act** (3)  
**acted** (10)  
**ACTION** (5)  
**actions** (6)  
**active** (6)  
**activities** (8)  
**activity** (3)  
**actress** (4)  
**actual** (3)  
**add** (6)  
**added** (1)  
**addition** (1)  
**additional** (1)  
**Additionally** (1)  
**additions** (1)  
**addressed** (5)  
**addressing** (1)  
**adequate** (1)  
**adequately** (1)  
**adhered** (2)  
**administration** (1)  
**administrative** (9)  
**administrator** (2)  
**admitted** (4)  
**admitting** (1)  
**admonished** (1)  
**advance** (5)  
**advanced** (1)  
**advances** (8)  
**advice** (6)  
**affect** (1)  
**affection** (1)  
**affections** (1)  
**mentioned** (2)  
**foresaid** (1)

**aforth** (1)  
**afraid** (1)  
**aftermath** (1)  
**afternoon** (1)  
**agent** (1)  
**ago** (28)  
**agree** (18)  
**agreed** (20)  
**agreeing** (1)  
**agreement** (19)  
**agreements** (2)  
**ahead** (35)  
**AIPAC** (2)  
**Airbnb** (6)  
**al** (2)  
**Alana** (18)  
**Albert** (3)  
**allegation** (24)  
**allegations** (36)  
**allege** (3)  
**alleged** (5)  
**allegedly** (3)  
**alleges** (1)  
**alleging** (2)  
**alleviate** (1)  
**allow** (10)  
**allowed** (25)  
**allowing** (1)  
**allude** (1)  
**alluded** (1)  
**allying** (1)  
**amazed** (1)  
**American** (1)  
**amount** (5)  
**amounts** (3)  
**Amy** (17)  
**Amy's** (2)  
**analysis** (1)  
**angels** (2)  
**anger** (1)  
**angry** (2)  
**ANN** (1)  
**announced** (1)  
**announcement** (1)  
**announces** (1)  
**announcing** (1)  
**annoyed** (1)  
**annually** (1)  
**anonymous** (1)

**answer** (229)  
**answered** (18)  
**answering** (24)  
**answers** (10)  
**answer's** (1)  
**anti-discrimination** (1)  
**anxious** (1)  
**anybody** (9)  
**anymore** (10)  
**anytime** (3)  
**anyway** (7)  
**apart** (1)  
**Apologize** (2)  
**apology** (1)  
**apparently** (7)  
**appear** (1)  
**APPEARANCES** (1)  
**appeared** (3)  
**appearing** (3)  
**appears** (1)  
**applaud** (1)  
**Apple** (2)  
**Apples** (1)  
**application** (1)  
**applied** (2)  
**applies** (1)  
**apply** (4)  
**approached** (4)  
**appropriate** (5)  
**approval** (2)  
**approve** (4)  
**approved** (2)  
**approximately** (1)  
**apps** (1)  
**April** (20)  
**arbitrary** (1)  
**arcane** (2)  
**area** (2)  
**argue** (2)  
**arguing** (1)  
**argument** (4)  
**Argumentative** (11)  
**arisen** (2)  
**arm** (2)  
**arrangement** (4)  
**arrangements** (2)  
**arrive** (1)  
**arrived** (1)

**article** (5)  
**articles** (2)  
**ascertain** (1)  
**ascribe** (1)  
**ascribed** (2)  
**aside** (4)  
**asked** (67)  
**asking** (59)  
**asks** (2)  
**aspect** (3)  
**aspects** (2)  
**aspirations** (1)  
**ass** (1)  
**assault** (3)  
**assaulted** (3)  
**assent** (1)  
**assert** (2)  
**assistant** (2)  
**associated** (2)  
**ASSOCIATES** (1)  
**assume** (2)  
**assuming** (1)  
**assurance** (1)  
**assurances** (1)  
**assure** (1)  
**assured** (2)  
**attached** (6)  
**attempt** (1)  
**attending** (1)  
**attention** (9)  
**attorney** (2)  
**attorney-client** (3)  
**attorneys** (10)  
**attorney's** (1)  
**attributing** (1)  
**Audio** (5)  
**audit** (2)  
**authenticate** (2)  
**authenticity** (3)  
**authority** (5)  
**authorization** (2)  
**authorize** (4)  
**authorized** (5)  
**authorizing** (2)  
**available** (4)  
**aware** (23)  
  
**< B >**  
**back** (79)



<b>background</b> (1)	<b>blabbering</b> (1)	<b>bumble</b> (1)	<b>CAVALIER</b> (500)
<b>backside</b> (2)	<b>black</b> (4)	<b>bumped</b> (1)	<b>cc'd</b> (4)
<b>backstabbing</b> (4)	<b>blank</b> (1)	<b>bunch</b> (2)	<b>censor</b> (2)
<b>bad</b> (9)	<b>blocked</b> (2)	<b>bury</b> (1)	<b>censoring</b> (1)
<b>badly</b> (2)	<b>Bloom</b> (23)	<b>business</b> (21)	<b>centered</b> (1)
<b>bait</b> (4)	<b>Bloom's</b> (1)	<b>busyness</b> (1)	<b>century</b> (1)
<b>baited</b> (1)	<b>blowback</b> (4)	<b>butt</b> (4)	<b>CEO</b> (17)
<b>Baldino</b> (2)	<b>board</b> (26)	<b>buy</b> (1)	<b>certain</b> (12)
<b>ballpark</b> (3)	<b>Boards</b> (6)	<b>Bylaws</b> (20)	<b>certainly</b> (5)
<b>bane</b> (3)	<b>bodily</b> (1)	<b>Bylaws,</b> (1)	<b>certification</b> (1)
<b>bank</b> (2)	<b>body</b> (3)		<b>certify</b> (2)
<b>bar</b> (3)	<b>bogus</b> (3)	< C >	<b>cetera</b> (3)
<b>BARBOUNIS</b> (65)	<b>bonds</b> (1)	<b>c3</b> (27)	<b>chair</b> (2)
<b>barking</b> (1)	<b>bone</b> (1)	<b>c4</b> (23)	<b>chairman</b> (7)
<b>barrage</b> (1)	<b>bookkeeper</b> (1)	<b>Caitriona</b> (26)	<b>chambers</b> (1)
<b>base</b> (1)	<b>bookkeeping</b> (1)	<b>Caitriona's</b> (3)	<b>chance</b> (5)
<b>based</b> (19)	<b>books</b> (2)	<b>calculate</b> (1)	<b>change</b> (9)
<b>basic</b> (1)	<b>borderline</b> (1)	<b>calculated</b> (2)	<b>changed</b> (5)
<b>basically</b> (2)	<b>borders</b> (1)	<b>Call</b> (36)	<b>changes</b> (9)
<b>basing</b> (1)	<b>boss</b> (1)	<b>called</b> (19)	<b>changing</b> (1)
<b>basis</b> (12)	<b>bossiness</b> (2)	<b>calling</b> (7)	<b>chaperones</b> (1)
<b>Bates</b> (1)	<b>bossing</b> (2)	<b>calls</b> (3)	<b>chapter</b> (1)
<b>Bates-marked</b> (1)	<b>bossy</b> (4)	<b>calumny</b> (1)	<b>character</b> (1)
<b>bathroom</b> (4)	<b>bottom</b> (8)	<b>campaign</b> (7)	<b>characterization</b> (5)
<b>beating</b> (2)	<b>bought</b> (2)	<b>campaigns</b> (3)	<b>characterize</b> (4)
<b>began</b> (6)	<b>bounce</b> (1)	<b>Canada</b> (1)	<b>charge</b> (8)
<b>beginning</b> (7)	<b>box</b> (1)	<b>candidates</b> (3)	<b>charges</b> (1)
<b>behalf</b> (4)	<b>Brady</b> (19)	<b>capable</b> (1)	<b>charter</b> (1)
<b>behave</b> (3)	<b>Brady's</b> (8)	<b>capacity</b> (2)	<b>check</b> (22)
<b>behaved</b> (3)	<b>brand</b> (1)	<b>card</b> (6)	<b>checked</b> (3)
<b>behavior</b> (15)	<b>breach</b> (2)	<b>cards</b> (1)	<b>checking</b> (1)
<b>behavior,</b> (2)	<b>break</b> (20)	<b>care</b> (8)	<b>checks</b> (2)
<b>behavior's</b> (1)	<b>breaking</b> (4)	<b>cared</b> (2)	<b>child</b> (1)
<b>believe</b> (53)	<b>brewing</b> (1)	<b>career</b> (1)	<b>children</b> (7)
<b>believed</b> (3)	<b>brick</b> (2)	<b>careful</b> (1)	<b>chilling</b> (1)
<b>belong</b> (1)	<b>brieser@discrimlaw.ne</b>	<b>carefully</b> (2)	<b>choice</b> (7)
<b>belongs</b> (1)	<b>t</b> (1)	<b>Caroline</b> (2)	<b>choose</b> (1)
<b>benefit</b> (1)	<b>brilliant</b> (1)	<b>CARSON</b> (697)	<b>chorus</b> (1)
<b>benefits</b> (5)	<b>bring</b> (15)	<b>Carson,</b> (1)	<b>chose</b> (3)
<b>Bennett</b> (9)	<b>bring-your-own-device</b>	<b>case</b> (74)	<b>circles</b> (1)
<b>Bennett's</b> (3)	<b>(1)</b>	<b>cases</b> (10)	<b>Circuit</b> (1)
<b>BENSON</b> (1)	<b>Britain</b> (7)	<b>cash</b> (1)	<b>circumstance</b> (1)
<b>best</b> (12)	<b>British</b> (3)	<b>catch</b> (1)	<b>circumstances</b> (3)
<b>better</b> (10)	<b>broadly</b> (1)	<b>categories</b> (1)	<b>cite</b> (1)
<b>beyond</b> (4)	<b>broke</b> (3)	<b>categorization</b> (4)	<b>CIVIL</b> (5)
<b>big</b> (5)	<b>brought</b> (17)	<b>category</b> (1)	<b>claim</b> (10)
<b>bill</b> (8)	<b>brushed</b> (1)	<b>cause</b> (3)	<b>claimed</b> (2)
<b>bills</b> (1)	<b>building</b> (3)	<b>caused</b> (1)	<b>claims</b> (5)
<b>bit</b> (3)	<b>bullshit</b> (1)	<b>causes</b> (1)	<b>classification</b> (1)

<b>clean</b> (6)	<b>complex</b> (4)	<b>consequences</b> (8)	<b>correcting</b> (1)
<b>clear</b> (32)	<b>compliance</b> (1)	<b>consequences,</b> (1)	<b>corrections</b> (3)
<b>clearly</b> (6)	<b>complicated</b> (3)	<b>consider</b> (20)	<b>correctly</b> (3)
<b>client</b> (23)	<b>complicates</b> (1)	<b>considered</b> (4)	<b>correspondence</b> (1)
<b>clients</b> (1)	<b>complication</b> (1)	<b>considering</b> (7)	<b>corroborate</b> (3)
<b>client's</b> (5)	<b>complications</b> (5)	<b>considers</b> (1)	<b>corroborated</b> (1)
<b>clock</b> (7)	<b>complicit</b> (10)	<b>consist</b> (1)	<b>corroborating</b> (1)
<b>close</b> (25)	<b>component</b> (1)	<b>consistent</b> (1)	<b>couch</b> (8)
<b>closed</b> (4)	<b>comprehensive</b> (5)	<b>consolidated</b> (1)	<b>could've</b> (11)
<b>closely</b> (9)	<b>computer</b> (2)	<b>conspiracy</b> (5)	<b>counsel</b> (16)
<b>closer</b> (1)	<b>computer-aided</b> (1)	<b>conspiring</b> (1)	<b>Counselor</b> (1)
<b>closes</b> (1)	<b>computer's</b> (1)	<b>constant</b> (1)	<b>Counsels</b> (4)
<b>Code</b> (1)	<b>concern</b> (14)	<b>contact</b> (11)	<b>counsel's</b> (1)
<b>colleague</b> (1)	<b>concerned</b> (23)	<b>contacted</b> (6)	<b>count</b> (5)
<b>colleagues</b> (2)	<b>concerning</b> (5)	<b>contacts</b> (5)	<b>counted</b> (2)
<b>collect</b> (2)	<b>concerns</b> (7)	<b>cont'd</b> (1)	<b>counterclaim</b> (33)
<b>collected</b> (2)	<b>concluded</b> (4)	<b>contemporaneous</b> (1)	<b>counterclaims</b> (5)
<b>college</b> (1)	<b>concluding</b> (1)	<b>content</b> (16)	<b>counting</b> (1)
<b>come</b> (80)	<b>conclusion</b> (8)	<b>contented</b> (1)	<b>counts</b> (1)
<b>comes</b> (11)	<b>conclusions</b> (1)	<b>contention</b> (1)	<b>couple</b> (3)
<b>comfortable</b> (4)	<b>concoct</b> (2)	<b>contentment</b> (2)	<b>course</b> (20)
<b>coming</b> (13)	<b>concocted</b> (16)	<b>context</b> (10)	<b>COURT</b> (82)
<b>command</b> (2)	<b>concoction</b> (3)	<b>Continue</b> (14)	<b>courtesy</b> (1)
<b>commencing</b> (1)	<b>condition</b> (2)	<b>continued</b> (14)	<b>courtroom</b> (1)
<b>comment</b> (1)	<b>conditions</b> (12)	<b>continues</b> (4)	<b>court's</b> (1)
<b>comments</b> (6)	<b>conduct</b> (22)	<b>continuing</b> (1)	<b>cover</b> (1)
<b>commission</b> (1)	<b>conducted</b> (1)	<b>continuously</b> (1)	<b>COZEN</b> (3)
<b>commit</b> (1)	<b>conference</b> (4)	<b>contradict</b> (1)	<b>crazy</b> (2)
<b>committee</b> (2)	<b>confidant</b> (2)	<b>contradiction</b> (5)	<b>create</b> (3)
<b>Commonwealth</b> (1)	<b>confidence</b> (1)	<b>contradictions</b> (2)	<b>created</b> (6)
<b>communication</b> (3)	<b>confident</b> (1)	<b>contradictory</b> (4)	<b>creative</b> (1)
<b>communications</b> (4)	<b>confidential</b> (3)	<b>contrary</b> (1)	<b>credence</b> (1)
<b>companies</b> (2)	<b>confidentiality</b> (5)	<b>contribution</b> (1)	<b>credibility</b> (4)
<b>company</b> (12)	<b>confines</b> (1)	<b>control</b> (5)	<b>credible</b> (11)
<b>compare</b> (2)	<b>confirm</b> (3)	<b>controversial</b> (1)	<b>credit</b> (2)
<b>Compared</b> (1)	<b>confirmed</b> (2)	<b>convenience</b> (1)	<b>criminal</b> (2)
<b>comparing</b> (2)	<b>confirming</b> (3)	<b>conversation</b> (12)	<b>crisis</b> (2)
<b>compensate</b> (1)	<b>confirms</b> (2)	<b>conversations</b> (4)	<b>critical</b> (4)
<b>compensated</b> (2)	<b>confront</b> (1)	<b>convinced</b> (1)	<b>criticisms</b> (1)
<b>complain</b> (21)	<b>confronted</b> (2)	<b>convulses</b> (1)	<b>crossed</b> (1)
<b>complainants</b> (3)	<b>confusing</b> (1)	<b>COO</b> (1)	<b>crosses</b> (1)
<b>complained</b> (21)	<b>congratulate</b> (2)	<b>cooperate</b> (1)	<b>cross-talk</b> (98)
<b>complaining</b> (15)	<b>Congratulations</b> (1)	<b>copied</b> (1)	<b>crowded</b> (1)
<b>complains</b> (2)	<b>Congress</b> (2)	<b>copying</b> (1)	<b>crucial</b> (1)
<b>complaint</b> (59)	<b>conjunction</b> (1)	<b>core</b> (1)	<b>cunt</b> (1)
<b>complaints</b> (77)	<b>connected</b> (8)	<b>corner</b> (1)	<b>current</b> (5)
<b>complete</b> (6)	<b>connection</b> (8)	<b>corporate</b> (12)	<b>curtailed</b> (1)
<b>completed</b> (3)	<b>connived</b> (2)	<b>correct</b> (163)	<b>custody</b> (1)
<b>completely</b> (6)	<b>consensual</b> (2)	<b>corrected</b> (1)	<b>cut</b> (2)

<b>cuts</b> (1)	<b>definitely</b> (12)	<b>different</b> (29)	<b>distance</b> (1)
<b>cutting</b> (1)	<b>definition</b> (2)	<b>differently</b> (1)	<b>distancing</b> (1)
<b>&lt; D &gt;</b>	<b>definitions</b> (1)	<b>difficult</b> (9)	<b>distinction</b> (1)
<b>D.C</b> (3)	<b>Delaney</b> (10)	<b>diminished</b> (1)	<b>distinctly</b> (1)
<b>D.C.</b> (1)	<b>delve</b> (1)	<b>dinner</b> (1)	<b>distorted</b> (1)
<b>D0000017</b> (1)	<b>demand</b> (4)	<b>direct</b> (5)	<b>distracted</b> (1)
<b>D000024</b> (1)	<b>demanded</b> (1)	<b>directed</b> (2)	<b>DISTRICT</b> (4)
<b>D000037</b> (1)	<b>demanding</b> (1)	<b>directive</b> (1)	<b>disturbing</b> (2)
<b>da</b> (9)	<b>den</b> (7)	<b>directives</b> (1)	<b>divided</b> (1)
<b>dad</b> (3)	<b>denial</b> (1)	<b>directly</b> (11)	<b>doc</b> (1)
<b>Daily</b> (1)	<b>denied</b> (7)	<b>director</b> (42)	<b>docket</b> (1)
<b>damage</b> (1)	<b>denies</b> (2)	<b>directors</b> (13)	<b>docking</b> (1)
<b>damages</b> (9)	<b>denounces</b> (1)	<b>directorship</b> (4)	<b>docks</b> (1)
<b>damaging</b> (1)	<b>denying</b> (1)	<b>directs</b> (1)	<b>Docs</b> (3)
<b>damn</b> (1)	<b>dep</b> (1)	<b>disadvantage</b> (1)	<b>document</b> (103)
<b>Dan</b> (2)	<b>depends</b> (4)	<b>disadvantaged</b> (1)	<b>documenting</b> (1)
<b>dangers</b> (1)	<b>deponent</b> (3)	<b>disagree</b> (8)	<b>documents</b> (49)
<b>DANIEL</b> (66)	<b>deponent's</b> (1)	<b>Disagreement</b> (1)	<b>document's</b> (1)
<b>Daniel,</b> (1)	<b>deposed</b> (2)	<b>disappear</b> (5)	<b>doing</b> (41)
<b>Danny</b> (11)	<b>deposing</b> (1)	<b>disappeared</b> (3)	<b>dollars</b> (4)
<b>date</b> (15)	<b>deposition</b> (36)	<b>disappointed</b> (5)	<b>dominated</b> (1)
<b>dated</b> (10)	<b>depositions</b> (4)	<b>discern</b> (1)	<b>donated</b> (1)
<b>dates</b> (3)	<b>depreciation</b> (1)	<b>discipline</b> (1)	<b>donations</b> (7)
<b>day</b> (31)	<b>DEPUTY</b> (11)	<b>disclose</b> (2)	<b>donor</b> (9)
<b>days</b> (7)	<b>DEREK</b> (11)	<b>disclosed</b> (1)	<b>donors</b> (10)
<b>day-to-day</b> (1)	<b>derivative</b> (8)	<b>disclosures</b> (1)	<b>door</b> (4)
<b>deadlines</b> (2)	<b>describe</b> (4)	<b>discontent</b> (1)	<b>double</b> (1)
<b>deal</b> (34)	<b>described</b> (2)	<b>discovery</b> (8)	<b>doubt</b> (1)
<b>dealing</b> (7)	<b>describes</b> (1)	<b>discrepancy</b> (3)	<b>doubts</b> (4)
<b>dealt</b> (27)	<b>describing</b> (2)	<b>discrimination</b> (11)	<b>download</b> (1)
<b>Dear</b> (1)	<b>DESCRIPTION</b> (8)	<b>discuss</b> (7)	<b>downs</b> (1)
<b>deceit</b> (10)	<b>designed</b> (1)	<b>discussed</b> (8)	<b>downstairs</b> (1)
<b>deceitful</b> (7)	<b>despite</b> (2)	<b>discussing</b> (3)	<b>Dr</b> (1)
<b>decide</b> (5)	<b>destroy</b> (4)	<b>discussion</b> (18)	<b>draft</b> (5)
<b>decided</b> (20)	<b>detail</b> (9)	<b>discussions</b> (8)	<b>dragged</b> (1)
<b>decides</b> (2)	<b>detailed</b> (2)	<b>disguised</b> (1)	<b>drastic</b> (1)
<b>decision</b> (15)	<b>details</b> (5)	<b>disgust</b> (1)	<b>drill</b> (2)
<b>decisions</b> (6)	<b>determination</b> (3)	<b>dishonest</b> (1)	<b>drinks</b> (1)
<b>declaration</b> (1)	<b>determine</b> (6)	<b>disinvited</b> (2)	<b>drive</b> (4)
<b>decrease</b> (1)	<b>determined</b> (1)	<b>dislike</b> (2)	<b>dropped</b> (1)
<b>deem</b> (1)	<b>determining</b> (1)	<b>disliking</b> (1)	<b>Due</b> (9)
<b>deemed</b> (1)	<b>detrimental</b> (1)	<b>dismay</b> (1)	<b>duly</b> (2)
<b>de-emphasize</b> (1)	<b>development</b> (5)	<b>disparages</b> (1)	<b>duties</b> (2)
<b>deep</b> (1)	<b>developments</b> (1)	<b>displeased</b> (2)	<b>duty</b> (5)
<b>Defendant</b> (8)	<b>devote</b> (1)	<b>displeasure</b> (1)	<b>dynamic</b> (1)
<b>Defendants</b> (2)	<b>devoted</b> (2)	<b>dispute</b> (1)	<b>&lt; E &gt;</b>
<b>defense</b> (2)	<b>dial</b> (1)	<b>disregarded</b> (1)	<b>eager</b> (1)
<b>define</b> (1)	<b>difference</b> (7)	<b>disrupted</b> (1)	<b>ear</b> (2)
	<b>differences</b> (1)	<b>dissuaded</b> (1)	

<b>earlier</b> (17)	<b>engage</b> (8)	<b>example</b> (9)	<b>fail</b> (1)
<b>early</b> (16)	<b>engaged</b> (7)	<b>examples</b> (1)	<b>failure</b> (1)
<b>earned</b> (2)	<b>engages</b> (1)	<b>excellent</b> (1)	<b>Fair</b> (5)
<b>easily</b> (2)	<b>English</b> (2)	<b>exception</b> (3)	<b>fairly</b> (1)
<b>EAST</b> (159)	<b>enhances</b> (1)	<b>exchanges</b> (1)	<b>fall</b> (2)
<b>EASTERN</b> (8)	<b>enormous</b> (3)	<b>excluded</b> (3)	<b>falls</b> (1)
<b>easy</b> (2)	<b>entangled</b> (2)	<b>excluding</b> (1)	<b>false</b> (16)
<b>editorial</b> (1)	<b>enter</b> (1)	<b>excuse</b> (5)	<b>falsehood</b> (2)
<b>editorializing</b> (1)	<b>entered</b> (3)	<b>excused</b> (1)	<b>fantasy</b> (1)
<b>EEOC</b> (5)	<b>enthusiastic</b> (2)	<b>executive</b> (2)	<b>far</b> (20)
<b>eerily</b> (1)	<b>enthusiastically</b> (1)	<b>Exhibit</b> (10)	<b>far-reaching</b> (1)
<b>effect</b> (5)	<b>entices</b> (1)	<b>exhibition</b> (2)	<b>faster</b> (1)
<b>effectively</b> (4)	<b>entire</b> (14)	<b>EXHIBITS</b> (4)	<b>father</b> (10)
<b>effects</b> (1)	<b>entirely</b> (10)	<b>exist</b> (3)	<b>fault</b> (3)
<b>efficacy</b> (1)	<b>entitled</b> (2)	<b>existed</b> (1)	<b>favor</b> (1)
<b>efforts</b> (1)	<b>entity</b> (2)	<b>existence</b> (1)	<b>favors</b> (2)
<b>eight</b> (23)	<b>entrust</b> (2)	<b>exists</b> (1)	<b>fear</b> (1)
<b>eight-hundred-some</b> (1)	<b>environment</b> (1)	<b>expand</b> (1)	<b>feared</b> (1)
<b>either</b> (12)	<b>equal</b> (1)	<b>expect</b> (1)	<b>February</b> (4)
<b>ejected</b> (3)	<b>equals</b> (1)	<b>expedition</b> (1)	<b>fed</b> (2)
<b>ejected,</b> (1)	<b>equate</b> (1)	<b>expeditiously</b> (6)	<b>Federal</b> (2)
<b>elaborate</b> (1)	<b>era</b> (2)	<b>expense</b> (7)	<b>feel</b> (9)
<b>elaborated</b> (2)	<b>Erica</b> (1)	<b>expenses</b> (6)	<b>feeling</b> (2)
<b>elaboration</b> (1)	<b>errata</b> (5)	<b>experience</b> (2)	<b>feelings</b> (1)
<b>elected</b> (5)	<b>errors</b> (4)	<b>experienced</b> (1)	<b>feels</b> (1)
<b>electronic</b> (4)	<b>escalation</b> (1)	<b>expert</b> (2)	<b>feet</b> (2)
<b>Email</b> (98)	<b>especially</b> (3)	<b>expires</b> (1)	<b>fell</b> (1)
<b>Emails</b> (40)	<b>ESQUIRE</b> (5)	<b>explain</b> (12)	<b>felt</b> (5)
<b>Eman</b> (10)	<b>essentially</b> (6)	<b>explained</b> (9)	<b>female</b> (12)
<b>embarrass</b> (1)	<b>EST</b> (1)	<b>explaining</b> (1)	<b>fiduciary</b> (1)
<b>embarrassed</b> (1)	<b>et</b> (5)	<b>explanation</b> (2)	<b>fight</b> (2)
<b>emergency</b> (1)	<b>ethical</b> (1)	<b>explicitly</b> (1)	<b>figuratively</b> (1)
<b>emotions</b> (1)	<b>evening</b> (3)	<b>exposed</b> (1)	<b>figure</b> (13)
<b>emphasis</b> (1)	<b>events</b> (5)	<b>exposition</b> (1)	<b>figured</b> (1)
<b>employee</b> (25)	<b>eventually</b> (1)	<b>exposure</b> (1)	<b>figuring</b> (2)
<b>employees</b> (38)	<b>Everest</b> (2)	<b>expound</b> (1)	<b>file</b> (6)
<b>employee's</b> (2)	<b>everybody</b> (9)	<b>expressed</b> (2)	<b>filed</b> (7)
<b>employment</b> (17)	<b>everybody's</b> (1)	<b>extensive</b> (2)	<b>filing</b> (2)
<b>en</b> (1)	<b>everyone's</b> (7)	<b>extent</b> (16)	<b>fill</b> (2)
<b>encounter</b> (1)	<b>everything,</b> (1)	<b>external</b> (1)	<b>filling</b> (1)
<b>ended</b> (6)	<b>everything's</b> (2)	<b>extra</b> (3)	<b>final</b> (1)
<b>Endless</b> (5)	<b>evidence</b> (10)	<b>extraordinarily</b> (1)	<b>finance</b> (1)
<b>endorse</b> (3)	<b>exact</b> (11)		<b>finances</b> (5)
<b>endorsed</b> (1)	<b>exactly</b> (14)	<b>&lt; F &gt;</b>	<b>financially</b> (1)
<b>endure</b> (2)	<b>exaggerate</b> (1)	<b>face</b> (15)	<b>find</b> (24)
<b>energy</b> (1)	<b>exaggerating</b> (1)	<b>faces</b> (1)	<b>finding</b> (5)
<b>enforce</b> (1)	<b>EXAMINATION</b> (1)	<b>facilitate</b> (1)	<b>finds</b> (1)
<b>enforcing</b> (1)	<b>examined</b> (1)	<b>fact</b> (24)	<b>fine</b> (34)
	<b>Examiner</b> (4)	<b>facts</b> (2)	<b>finish</b> (70)



<b>finished</b> (17)	<b>frankly</b> (3)	<b>glad</b> (2)	<b>handwrote</b> (2)
<b>finishing</b> (2)	<b>fraternizing</b> (1)	<b>go</b> (130)	<b>Hang</b> (1)
<b>FINK</b> (8)	<b>fraudulent</b> (1)	<b>god</b> (1)	<b>happen</b> (12)
<b>fire</b> (11)	<b>free</b> (5)	<b>goes</b> (12)	<b>happened</b> (48)
<b>fireable</b> (1)	<b>frequent</b> (1)	<b>going</b> (61)	<b>happening</b> (2)
<b>fired</b> (10)	<b>friendly</b> (1)	<b>GOLD</b> (2)	<b>happens</b> (2)
<b>firing</b> (2)	<b>friends</b> (4)	<b>gonna</b> (253)	<b>happiness</b> (1)
<b>Firm</b> (4)	<b>friendship</b> (2)	<b>good</b> (22)	<b>happy</b> (22)
<b>first</b> (58)	<b>friendships</b> (2)	<b>Goodman</b> (15)	<b>harass</b> (2)
<b>fit</b> (3)	<b>front</b> (19)	<b>Gotcha</b> (1)	<b>harassed</b> (4)
<b>five</b> (23)	<b>fuckin</b> (1)	<b>gotta</b> (23)	<b>harasser</b> (1)
<b>five-minute</b> (2)	<b>full</b> (8)	<b>governance</b> (1)	<b>harassment</b> (41)
<b>fix</b> (1)	<b>full-bloomed</b> (1)	<b>governing</b> (1)	<b>hard</b> (10)
<b>fixing</b> (1)	<b>full-blown</b> (1)	<b>Government's</b> (1)	<b>harmful</b> (6)
<b>focus</b> (5)	<b>full-time</b> (1)	<b>Governors</b> (21)	<b>harsh</b> (1)
<b>focused</b> (2)	<b>fully</b> (2)	<b>GR</b> (1)	<b>hating</b> (3)
<b>follow</b> (4)	<b>fun</b> (2)	<b>Grace</b> (3)	<b>have,</b> (1)
<b>followed</b> (1)	<b>fundraising</b> (3)	<b>grant</b> (1)	<b>head</b> (13)
<b>following</b> (8)	<b>funds</b> (3)	<b>granted</b> (2)	<b>health</b> (11)
<b>follows</b> (1)	<b>funny</b> (1)	<b>Grayson</b> (1)	<b>hear</b> (74)
<b>foot</b> (3)	<b>further</b> (9)	<b>great</b> (9)	<b>heard</b> (52)
<b>footing</b> (1)	<b>future</b> (12)	<b>green</b> (3)	<b>hearing</b> (4)
<b>force</b> (3)	<b>future,</b> (1)	<b>Gregg</b> (382)	<b>hearsay</b> (1)
<b>forced</b> (2)		<b>Gregg's</b> (30)	<b>heart</b> (1)
<b>forcing</b> (4)	<b>&lt; G &gt;</b>	<b>grievances</b> (1)	<b>he'd</b> (1)
<b>foregoing</b> (1)	<b>Gabrielle</b> (24)	<b>gross</b> (2)	<b>held</b> (9)
<b>forensic</b> (1)	<b>gain</b> (1)	<b>ground</b> (1)	<b>hell</b> (1)
<b>Forever</b> (1)	<b>gala</b> (1)	<b>grounds</b> (4)	<b>Hello</b> (2)
<b>forget</b> (4)	<b>Gambill</b> (3)	<b>GROUP</b> (12)	<b>help</b> (17)
<b>Forgetting</b> (1)	<b>games</b> (7)	<b>Guardian</b> (2)	<b>helpful</b> (1)
<b>forgot</b> (2)	<b>Gary</b> (5)	<b>guess</b> (17)	<b>helping</b> (1)
<b>forgotten</b> (1)	<b>gathering</b> (1)	<b>guesses</b> (1)	<b>helps</b> (1)
<b>form</b> (199)	<b>gearing</b> (1)	<b>gunning</b> (3)	<b>henceforth</b> (2)
<b>former</b> (1)	<b>G-E-L</b> (1)	<b>guy</b> (3)	<b>here,</b> (1)
<b>forth</b> (12)	<b>gender</b> (2)	<b>guys</b> (39)	<b>heroes</b> (2)
<b>FORUM</b> (166)	<b>general</b> (3)		<b>hesitant</b> (1)
<b>Forum's</b> (3)	<b>generalizations</b> (1)	<b>&lt; H &gt;</b>	<b>Hey</b> (7)
<b>Forum-wide</b> (1)	<b>generally</b> (4)	<b>hair</b> (1)	<b>hi</b> (1)
<b>forward</b> (6)	<b>germane</b> (1)	<b>half</b> (11)	<b>hid</b> (8)
<b>forward,</b> (1)	<b>getting</b> (21)	<b>halfway</b> (1)	<b>hide</b> (2)
<b>forwarded</b> (1)	<b>giant</b> (1)	<b>hand</b> (14)	<b>hiding</b> (6)
<b>found</b> (18)	<b>gifted</b> (1)	<b>handed</b> (3)	<b>high</b> (3)
<b>foundation</b> (32)	<b>gig</b> (1)	<b>handing</b> (1)	<b>higher</b> (3)
<b>foundations</b> (3)	<b>ginned</b> (1)	<b>hand-in-hand</b> (3)	<b>highest</b> (1)
<b>Four</b> (12)	<b>gist</b> (1)	<b>handle</b> (1)	<b>highlight</b> (2)
<b>four-page</b> (1)	<b>give</b> (51)	<b>handled</b> (5)	<b>highlighted</b> (2)
<b>fours</b> (1)	<b>given</b> (6)	<b>handles</b> (2)	<b>highly</b> (3)
<b>fourth</b> (2)	<b>gives</b> (1)	<b>hands</b> (4)	<b>hint</b> (1)
<b>Frank</b> (4)	<b>giving</b> (12)	<b>handwritten</b> (8)	<b>hire</b> (5)

<b>hired</b> (1)	<b>imply</b> (1)	<b>informed</b> (1)	<b>interrogatory</b> (1)
<b>hiring</b> (2)	<b>implying</b> (2)	<b>informing</b> (1)	<b>interrupt</b> (26)
<b>history</b> (4)	<b>impolite</b> (1)	<b>inherent</b> (1)	<b>interrupted</b> (7)
<b>hit</b> (8)	<b>import</b> (1)	<b>initial</b> (8)	<b>interrupting</b> (12)
<b>Hm</b> (1)	<b>important</b> (17)	<b>initially</b> (4)	<b>interruption</b> (1)
<b>Hold</b> (20)	<b>importantly</b> (1)	<b>initiate</b> (1)	<b>interruptions</b> (1)
<b>Hollin</b> (1)	<b>imposed</b> (1)	<b>initiated</b> (9)	<b>interview</b> (11)
<b>Hollin's</b> (1)	<b>impossible</b> (1)	<b>initiation</b> (2)	<b>interviewed</b> (9)
<b>honest</b> (1)	<b>improprieties</b> (1)	<b>initiative</b> (3)	<b>interviews</b> (2)
<b>honestly</b> (2)	<b>impugn</b> (1)	<b>in-office</b> (4)	<b>intimate</b> (1)
<b>honesty</b> (1)	<b>inaccurate</b> (1)	<b>inquire</b> (3)	<b>introverted</b> (1)
<b>hope</b> (2)	<b>inadvertent</b> (1)	<b>inquired</b> (1)	<b>invest</b> (1)
<b>hostilities</b> (6)	<b>inappropriate</b> (14)	<b>inquiries</b> (1)	<b>invested</b> (2)
<b>hotbed</b> (1)	<b>inappropriately</b> (1)	<b>inquiry</b> (3)	<b>investigate</b> (18)
<b>hotel</b> (8)	<b>Inaudible</b> (57)	<b>inquisitive</b> (1)	<b>investigated</b> (17)
<b>hour</b> (9)	<b>incessantly</b> (1)	<b>ins</b> (1)	<b>investigating</b> (4)
<b>hours</b> (13)	<b>incident</b> (8)	<b>instance</b> (3)	<b>investigation</b> (23)
<b>house</b> (1)	<b>incidents</b> (1)	<b>instances</b> (4)	<b>Investigator</b> (5)
<b>How'd</b> (1)	<b>include</b> (4)	<b>institution</b> (1)	<b>investment</b> (1)
<b>huge</b> (1)	<b>included</b> (3)	<b>instruct</b> (3)	<b>invite</b> (5)
<b>Huh</b> (1)	<b>including</b> (8)	<b>instructed</b> (1)	<b>invited</b> (7)
<b>human</b> (5)	<b>income</b> (2)	<b>instructing</b> (4)	<b>involve</b> (2)
<b>hun</b> (1)	<b>incomplete</b> (6)	<b>instruction</b> (4)	<b>Involved</b> (12)
<b>hundred</b> (9)	<b>incomprehensible</b> (2)	<b>instructions</b> (7)	<b>involves</b> (1)
<b>husband</b> (2)	<b>inconsist</b> (1)	<b>instructs</b> (1)	<b>irony</b> (1)
<b>hush</b> (1)	<b>inconsistencies</b> (2)	<b>insurance</b> (7)	<b>irrelevant</b> (2)
<b>hypothetical</b> (17)	<b>inconsistency</b> (4)	<b>intellectual</b> (1)	<b>IRS</b> (1)
<b>hypotheticals</b> (8)	<b>inconsistent</b> (3)	<b>intend</b> (1)	<b>Israel</b> (28)
<b>&lt; I &gt;</b>	<b>increase</b> , (1)	<b>intense</b> (3)	<b>issue</b> (22)
<b>idea</b> (28)	<b>increased</b> (4)	<b>intensely</b> (2)	<b>issued</b> (2)
<b>ideal</b> (1)	<b>incredible</b> (1)	<b>intention</b> (8)	<b>issues</b> (22)
<b>ideas</b> (2)	<b>incumbent</b> (1)	<b>intentionally</b> (1)	<b>issues</b> , (1)
<b>identify</b> (4)	<b>INDEX</b> (1)	<b>intentions</b> (3)	<b>it'd</b> (1)
<b>ignorance</b> (1)	<b>indicate</b> (5)	<b>intents</b> (1)	<b>it'll</b> (1)
<b>ill</b> (1)	<b>indicated</b> (4)	<b>inter</b> (1)	<b>its</b> (5)
<b>illegal</b> (6)	<b>indicates</b> (5)	<b>interaction</b> (1)	<b>&lt; J &gt;</b>
<b>imaginary</b> (2)	<b>indicating</b> (1)	<b>interactions</b> (2)	<b>Jack</b> (1)
<b>imagination</b> (3)	<b>indication</b> (4)	<b>intercourse</b> (1)	<b>James</b> (4)
<b>imagine</b> (1)	<b>indiscretions</b> (1)	<b>interest</b> (4)	<b>January</b> (3)
<b>Imagined</b> (2)	<b>Indistinguishable</b> (98)	<b>interested</b> (7)	<b>jcavalier@cozen.com</b>
<b>immediately</b> (6)	<b>individual</b> (2)	<b>interfere</b> (1)	(1)
<b>immunity</b> (3)	<b>individually</b> (1)	<b>interject</b> (2)	<b>Jeannine</b> (1)
<b>imperative</b> (1)	<b>individuals</b> (4)	<b>intern</b> (5)	<b>job</b> (44)
<b>implausible</b> (1)	<b>indulgence</b> (1)	<b>internal</b> (4)	<b>jobs</b> (4)
<b>implemented</b> (1)	<b>inflicted</b> (1)	<b>interpersonal</b> (1)	<b>Jon</b> (38)
<b>implicate</b> (1)	<b>influence</b> (1)	<b>interpret</b> (3)	<b>JONATHAN</b> (1)
<b>implicates</b> (1)	<b>inform</b> (1)	<b>interpretation</b> (1)	<b>Judge</b> (32)
<b>implication</b> (1)	<b>information</b> (33)	<b>interpreted</b> (2)	<b>Judging</b> (1)
	<b>informational</b> (1)	<b>interrogatories</b> (3)	

judgment (3)  
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 jump (1)  
 June (20)  
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 jury (3)  
 justifies (1)  
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keep (43)  
 keeps (3)  
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 kids (3)  
 kill (2)  
 killer (1)  
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 knife (1)  
 know (416)  
 know, (3)  
 knowing (5)  
 knowledge (4)  
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labeled (1)  
 labeling (1)  
 lacerating (1)  
 lack (12)  
 ladies (2)  
 lap (9)  
 laptop (21)  
 laptop, (1)  
 laptops (1)  
 Lara (9)  
 Lara's (2)  
 large (2)  
 largely (1)  
 larger (2)  
 large-scale (3)  
 late (6)  
 Laterally (1)

Laura (9)  
 Laura's (1)  
 LAW (31)  
 law, (1)  
 lawbooks (3)  
 Lawrence (2)  
 laws (4)  
 lawsuit (1)  
 lawsuits (9)  
 lawyer (15)  
 lawyers (6)  
 Lea (21)  
 lead (2)  
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 leeway (2)  
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 legally (4)  
 legitimate (2)  
 LEIGH (1)  
 length (1)  
 lengths (1)  
 lesson (4)  
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 letters (1)  
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 life (17)  
 life, (2)  
 lifted (3)  
 lights (1)

likes (1)  
 Likewise (1)  
 limit (2)  
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 line (5)  
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 Lisa's (3)  
 list (20)  
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 lists (2)  
 literally (4)  
 little (18)  
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 lives (11)  
 load (1)  
 loaded (3)  
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 logic (1)  
 long (26)  
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 lose (2)  
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 ludicrous (2)  
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 make-work (1)  
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 managing (2)  
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 manipulation (1)  
 manipulative (6)  
 manner (2)  
 manual (4)  
 manufactured (1)  
 MARC (25)  
 March (39)  
 mark (3)  
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 Marnie (130)  
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 McNulty's (2)  
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 mean (94)  
 means (9)

<b>meant</b> (9)	<b>minutes</b> (11)	<b>names</b> (21)	<b>numbers</b> (10)
<b>media</b> (16)	<b>mis</b> (2)	<b>name's</b> (1)	< O >
<b>mediate</b> (1)	<b>misappropriated</b> (1)	<b>narrative</b> (1)	<b>oath</b> (4)
<b>mediated</b> (2)	<b>misappropriation</b> (1)	<b>Nasty</b> (9)	<b>Object</b> (242)
<b>medical</b> (1)	<b>misbehaved</b> (1)	<b>national</b> (1)	<b>objecting</b> (7)
<b>medium</b> (2)	<b>misbehavior</b> (5)	<b>natural</b> (2)	<b>objection</b> (32)
<b>meet</b> (1)	<b>miscategorization</b> (1)	<b>naturally</b> (1)	<b>objections</b> (8)
<b>meeting</b> (22)	<b>mischaracterization</b> (6)	<b>nature</b> (10)	<b>objection's</b> (1)
<b>meetings</b> (6)	<b>mischaracterized</b> (1)	<b>NDA</b> (6)	<b>observe</b> (1)
<b>MEF</b> (29)	<b>mischaracterizing</b> (3)	<b>NDA, (1)</b>	<b>Obviously</b> (4)
<b>MEF, (1)</b>	<b>misconduct</b> (15)	<b>NDAs</b> (1)	<b>occasions</b> (2)
<b>Mekelburg</b> (5)	<b>misconstrued</b> (1)	<b>necessarily</b> (1)	<b>occurred</b> (3)
<b>member</b> (4)	<b>miserable</b> (1)	<b>necessary</b> (2)	<b>O'CONNOR</b> (3)
<b>members</b> (8)	<b>misread</b> (1)	<b>need</b> (28)	<b>October</b> (3)
<b>memo</b> (14)	<b>misrepresentation</b> (1)	<b>needed</b> (3)	<b>odd</b> (1)
<b>Memorandum</b> (3)	<b>mistake</b> (8)	<b>needs</b> (8)	<b>offer</b> (4)
<b>memorialize</b> (1)	<b>mistakes</b> (6)	<b>Neither</b> (2)	<b>offered</b> (4)
<b>memorialized</b> (1)	<b>misuse</b> (1)	<b>nest</b> (2)	<b>offers</b> (1)
<b>memories</b> (1)	<b>mitigated</b> (8)	<b>net</b> (3)	<b>offers</b> (1)
<b>memorize</b> (3)	<b>mix</b> (3)	<b>never</b> (57)	<b>office</b> (64)
<b>memorized</b> (1)	<b>mixed</b> (1)	<b>new</b> (21)	<b>officer</b> (3)
<b>memory</b> (2)	<b>Mm-hmm</b> (3)	<b>news</b> (2)	<b>officers</b> (9)
<b>men</b> (4)	<b>MO</b> (1)	<b>newspapers</b> (1)	<b>Officers, (2)</b>
<b>mental</b> (4)	<b>moan</b> (1)	<b>nice</b> (2)	<b>offices</b> (3)
<b>mention</b> (3)	<b>moaning</b> (6)	<b>night</b> (3)	<b>official</b> (7)
<b>MENTIONED</b> (9)	<b>moans</b> (1)	<b>nine</b> (4)	<b>Oh</b> (20)
<b>mentions</b> (1)	<b>moment</b> (5)	<b>no, (2)</b>	<b>Okay</b> (169)
<b>Merville</b> (19)	<b>money</b> (70)	<b>Nobody's</b> (1)	<b>old</b> (10)
<b>mess</b> (1)	<b>mongering</b> (2)	<b>nods</b> (1)	<b>omitting</b> (1)
<b>message</b> (2)	<b>Month</b> (7)	<b>noises</b> (1)	<b>omniscience</b> (1)
<b>Messages</b> (20)	<b>months</b> (32)	<b>noncommittal</b> (1)	<b>omniscient</b> (1)
<b>messaging</b> (1)	<b>morning</b> (5)	<b>Nonprofit</b> (5)	<b>once</b> (6)
<b>met</b> (7)	<b>mother</b> (7)	<b>nonprofits</b> (2)	<b>one-on-one</b> (2)
<b>metadata</b> (3)	<b>motion</b> (7)	<b>nonresponsive</b> (5)	<b>ones</b> (5)
<b>Meyer</b> (44)	<b>mouth</b> (1)	<b>nonresponsiveness</b> (1)	<b>one's</b> (2)
<b>MIDDLE</b> (165)	<b>mouths</b> (1)	<b>nonsense</b> (1)	<b>one-syllable</b> (1)
<b>might've</b> (4)	<b>move</b> (21)	<b>non-tax-deductible</b> (1)	<b>one-to-one</b> (1)
<b>mild</b> (1)	<b>moved</b> (11)	<b>Nope</b> (1)	<b>ongoing</b> (2)
<b>Miller</b> (1)	<b>moving</b> (4)	<b>normal</b> (3)	<b>online</b> (1)
<b>Miller's</b> (1)	<b>multiple</b> (3)	<b>Notary</b> (4)	<b>open</b> (11)
<b>million</b> (24)	<b>murder</b> (3)	<b>note</b> (19)	<b>open-ended</b> (2)
<b>millions</b> (1)	<b>muted</b> (1)	<b>noted</b> (5)	<b>opening</b> (5)
<b>mind</b> (7)	<b>mutual</b> (1)	<b>notes</b> (8)	<b>operations</b> (2)
<b>minds</b> (2)	< N >	<b>Notice</b> (2)	<b>opinion</b> (1)
<b>mine</b> (3)	<b>nail</b> (1)	<b>notify</b> (1)	<b>opportunity</b> (8)
<b>minimizing</b> (1)	<b>name</b> (39)	<b>noting</b> (1)	<b>opposing</b> (1)
<b>minimum</b> (1)	<b>named</b> (1)	<b>November</b> (143)	<b>opposite</b> (1)
<b>minor</b> (10)		<b>now, (1)</b>	<b>order</b> (25)
<b>minute</b> (15)		<b>NUMBER</b> (22)	<b>orders</b> (3)



<b>Ordinance</b> (2)	<b>passwords</b> (1)	<b>picture</b> (7)	<b>PNC</b> (1)
<b>ordinary</b> (1)	<b>pasted</b> (1)	<b>pictures</b> (1)	<b>poetic</b> (2)
<b>organization</b> (27)	<b>patently</b> (1)	<b>piling</b> (1)	<b>point</b> (44)
<b>organizationally</b> (1)	<b>path</b> (1)	<b>pillow</b> (1)	<b>point-blank</b> (1)
<b>organizations</b> (4)	<b>patience</b> (1)	<b>pin</b> (1)	<b>pointed</b> (3)
<b>organize</b> (1)	<b>Patricia</b> (14)	<b>PIPES</b> (155)	<b>pointedly</b> (1)
<b>Original</b> (2)	<b>Patricia's</b> (2)	<b>Pipes-1</b> (3)	<b>pointing</b> (4)
<b>originally</b> (1)	<b>pattern</b> (3)	<b>Pipes-10</b> (1)	<b>points</b> (3)
<b>other's</b> (3)	<b>pay</b> (19)	<b>Pipes-11</b> (1)	<b>policy</b> (19)
<b>otherwise,</b> (1)	<b>payday</b> (1)	<b>Pipes-12</b> (1)	<b>political</b> (10)
<b>outcome</b> (2)	<b>paying</b> (5)	<b>Pipes-13</b> (1)	<b>politically</b> (1)
<b>outline</b> (1)	<b>payment</b> (1)	<b>Pipes-14</b> (1)	<b>politics</b> (7)
<b>outlining</b> (1)	<b>payments</b> (2)	<b>Pipes-15</b> (1)	<b>pool</b> (1)
<b>out-of-office</b> (1)	<b>pending</b> (25)	<b>Pipes-16</b> (1)	<b>poor</b> (1)
<b>outrageous</b> (1)	<b>penis</b> (6)	<b>Pipes-17</b> (1)	<b>pop</b> (7)
<b>outs</b> (1)	<b>PENNSYLVANIA</b> (4)	<b>Pipes-18</b> (1)	<b>portfolio</b> (3)
<b>Outside</b> (4)	<b>people</b> (55)	<b>Pipes-19</b> (1)	<b>portray</b> (1)
<b>over'</b> (1)	<b>people's</b> (5)	<b>Pipes-2</b> (3)	<b>portrayed</b> (3)
<b>oversee</b> (2)	<b>percent</b> (9)	<b>Pipes-20</b> (1)	<b>Posepiak</b> (1)
<b>oversight</b> (2)	<b>perfect</b> (2)	<b>Pipes-21</b> (1)	<b>position</b> (31)
<b>owe</b> (1)	<b>perfectly</b> (3)	<b>Pipes-22</b> (1)	<b>positioned</b> (3)
<b>owed</b> (3)	<b>perform</b> (1)	<b>Pipes-23</b> (1)	<b>positions</b> (1)
	<b>period</b> (7)	<b>Pipes-24</b> (1)	<b>positive</b> (1)
<b>&lt; P &gt;</b>	<b>perks</b> (3)	<b>Pipes-25</b> (1)	<b>possession</b> (4)
<b>P.C</b> (1)	<b>permission</b> (13)	<b>Pipes-26</b> (1)	<b>possibility</b> (1)
<b>p.m</b> (16)	<b>permitted</b> (8)	<b>Pipes-27</b> (1)	<b>possible</b> (5)
<b>PA</b> (3)	<b>person</b> (33)	<b>Pipes-28</b> (1)	<b>possibly</b> (1)
<b>packed</b> (1)	<b>personal</b> (17)	<b>Pipes-29</b> (1)	<b>Post</b> (5)
<b>PAGE</b> (16)	<b>personalities</b> (1)	<b>Pipes-3</b> (3)	<b>pot</b> (1)
<b>pages</b> (7)	<b>personality</b> (4)	<b>Pipes-4</b> (3)	<b>potential</b> (2)
<b>paid</b> (42)	<b>Personally</b> (5)	<b>Pipes-5</b> (1)	<b>potentially</b> (2)
<b>panoply</b> (1)	<b>personnel</b> (5)	<b>Pipes-6</b> (1)	<b>power</b> (5)
<b>paper</b> (1)	<b>persons</b> (2)	<b>Pipes-7</b> (2)	<b>powers</b> (1)
<b>paperwork</b> (2)	<b>pertained</b> (1)	<b>Pipes-8</b> (3)	<b>Practice</b> (3)
<b>paragraph</b> (4)	<b>pertinent</b> (8)	<b>Pipes-9</b> (1)	<b>pre</b> (6)
<b>parameters</b> (6)	<b>perverted</b> (1)	<b>Place</b> (30)	<b>pre-authorized</b> (2)
<b>paraphrased</b> (1)	<b>Philadelphia</b> (8)	<b>Plaintiff</b> (6)	<b>precedence</b> (1)
<b>part</b> (38)	<b>Philly</b> (1)	<b>plaintiffs</b> (7)	<b>precise</b> (1)
<b>partially</b> (2)	<b>phone</b> (16)	<b>plan</b> (1)	<b>precisely</b> (1)
<b>participant</b> (1)	<b>phonetic</b> (5)	<b>planning</b> (4)	<b>Predated</b> (1)
<b>participate</b> (1)	<b>photograph</b> (1)	<b>plate</b> (1)	<b>predator</b> (1)
<b>particular</b> (6)	<b>photographs</b> (2)	<b>play</b> (1)	<b>pre-March</b> (1)
<b>particularized</b> (1)	<b>photos</b> (1)	<b>played</b> (4)	<b>preparation</b> (1)
<b>particularly</b> (7)	<b>PHRA</b> (2)	<b>playing</b> (7)	<b>prepared</b> (4)
<b>parties</b> (3)	<b>phrase</b> (1)	<b>plea</b> (1)	<b>Preparing</b> (3)
<b>parts</b> (1)	<b>physical</b> (2)	<b>pleasantries</b> (1)	<b>presence</b> (2)
<b>party</b> (2)	<b>physically</b> (4)	<b>please</b> (39)	<b>PRESENT</b> (17)
<b>pass</b> (1)	<b>pick</b> (2)	<b>pleased</b> (4)	<b>presented</b> (1)
<b>passed</b> (1)	<b>picks</b> (1)	<b>plenty</b> (2)	<b>presenting</b> (1)

presently (1)  
 presents (1)  
 preservation (1)  
 President (23)  
 press (1)  
 Presumably (4)  
 pretend (3)  
 pretended (2)  
 pretty (4)  
 prevent (2)  
 previous (4)  
 previously (2)  
 principals (3)  
 printout (1)  
 prior (8)  
 priority (1)  
 private (5)  
 privilege (17)  
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 privileged, (1)  
 privileges (1)  
 pro (4)  
 probably (6)  
 probation (4)  
 probationary (6)  
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 problem, (1)  
 problems (25)  
 Procedure (3)  
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 proceeding (5)  
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 production (7)  
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 profit (1)  
 Profusely (1)  
 prohibit (2)  
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 project (10)  
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 promise (2)  
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propositions (1)  
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 Prosser (2)  
 protect (5)  
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 protection (1)  
 protest (1)  
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 protocol (1)  
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 prove (2)  
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 provide (14)  
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 providence (2)  
 provides (1)  
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 proxy (1)  
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 Public (10)  
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 punitive (9)  
 purchased (2)  
 purple (2)  
 purpose (2)  
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 pursuant (2)  
 pursue (2)  
 purveying (1)  
 purview (3)  
 push (2)  
 put (39)  
 puts (1)  
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 < Q >  
 question (246)  
 questioning (2)  
 questions (65)  
 question's (2)  
 quick (3)

quickly (5)  
 quid (4)  
 quiet (5)  
 quit (1)  
 quite (4)  
 quiver (1)  
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 < R >  
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 Range (5)  
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 rates (1)  
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 reached (3)  
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 realized (5)  
 really (26)  
 rearrange (1)  
 reason (39)  
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 reasons (9)  
 Rebel (2)  
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 receipt (1)  
 receipts (1)  
 receive (5)  
 received (12)  
 receiving (4)  
 recess (5)  
 recite (2)

recognize (3)  
 recollection (1)  
 reconcile (1)  
 record (76)  
 recorded (3)  
 Recording (31)  
 records (9)  
 recruit (2)  
 red (1)  
 reduce (2)  
 refer (4)  
 reference (4)  
 referenced (2)  
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 referencing (11)  
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 refreshers (1)  
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 refused (1)  
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 regard (4)  
 Regarding (6)  
 regime (1)  
 regularly (1)  
 regularly, (1)  
 reimburse (3)  
 reimbursed (5)  
 reimbursement (1)  
 reimbursing (1)  
 reinstated (3)  
 reiterate (1)  
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 rejoined (3)  
 relate (2)  
 related (13)  
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 relations (10)  
 relationship (12)  
 relationships (1)  
 relevancy (1)  
 relevant (6)  
 relief (1)  
 reluctance (1)  
 rely (1)  
 rem (1)  
 remain (5)

<b>remainder</b> (1)	<b>resolve</b> (3)	<b>roughly</b> (3)	<b>secret</b> (5)
<b>remained</b> (2)	<b>resources</b> (5)	<b>round</b> (4)	<b>secretary</b> (4)
<b>remaining</b> (1)	<b>respect</b> (1)	<b>rub</b> (1)	<b>secrets</b> (7)
<b>remains</b> (2)	<b>respective</b> (1)	<b>rule</b> (5)	<b>section</b> (8)
<b>remember</b> (113)	<b>respond</b> (3)	<b>Rules</b> (3)	<b>see</b> (99)
<b>remember, (1)</b>	<b>responded</b> (4)	<b>ruling</b> (1)	<b>seeing</b> (3)
<b>remind</b> (5)	<b>responding</b> (6)	<b>rumor</b> (38)	<b>seek</b> (1)
<b>reminded</b> (1)	<b>responds</b> (2)	<b>rumor, (1)</b>	<b>seeks</b> (1)
<b>remotely</b> (4)	<b>response</b> (20)	<b>rumors</b> (8)	<b>seen</b> (13)
<b>remove</b> (1)	<b>responses</b> (5)	<b>run</b> (2)	<b>select</b> (2)
<b>removed</b> (11)	<b>responsibilities</b> (2)	<b>running</b> (1)	<b>self-evident</b> (1)
<b>removing</b> (1)	<b>responsibility</b> (10)	<b>ruse</b> (1)	<b>Self-explanatory</b> (1)
<b>remuneration</b> (3)	<b>responsible</b> (5)		<b>self-reporting</b> (1)
<b>repeat</b> (2)	<b>responsive</b> (10)	<b>&lt; S &gt;</b>	<b>send</b> (16)
<b>repeated</b> (1)	<b>rest</b> (2)	<b>sabotage</b> (1)	<b>sending</b> (2)
<b>repeatedly</b> (3)	<b>restated</b> (1)	<b>safe</b> (4)	<b>sense</b> (6)
<b>repeating</b> (3)	<b>restrictions</b> (4)	<b>safeguards</b> (1)	<b>sensitive</b> (4)
<b>repercussions</b> (5)	<b>resulting</b> (1)	<b>safety</b> (4)	<b>sent</b> (50)
<b>rephrase</b> (1)	<b>resume</b> (2)	<b>sake</b> (2)	<b>sentence</b> (11)
<b>replace</b> (1)	<b>resumed</b> (1)	<b>salary</b> (10)	<b>separate</b> (12)
<b>replied</b> (2)	<b>retain</b> (1)	<b>Samantha</b> (1)	<b>September</b> (1)
<b>reply</b> (2)	<b>retained</b> (1)	<b>sat</b> (2)	<b>sergeant</b> (1)
<b>report</b> (29)	<b>retaliate</b> (2)	<b>satchel</b> (1)	<b>serial</b> (1)
<b>reported</b> (12)	<b>retaliated</b> (1)	<b>satisfaction</b> (12)	<b>serious</b> (5)
<b>Reporter</b> (79)	<b>retaliation</b> (22)	<b>satisfactorily</b> (4)	<b>Seriously</b> (12)
<b>reporters</b> (2)	<b>retold</b> (1)	<b>satisfied</b> (4)	<b>seriousness</b> (1)
<b>Reporting</b> (16)	<b>return</b> (11)	<b>saw</b> (17)	<b>serve</b> (1)
<b>reports</b> (14)	<b>returned</b> (2)	<b>saying</b> (87)	<b>Serving</b> (1)
<b>represent</b> (14)	<b>returning</b> (2)	<b>says</b> (63)	<b>session</b> (2)
<b>representation</b> (1)	<b>reuse</b> (1)	<b>scared</b> (3)	<b>set</b> (4)
<b>Representative</b> (1)	<b>review</b> (9)	<b>scene</b> (1)	<b>SETH</b> (64)
<b>represented</b> (4)	<b>reviewed</b> (3)	<b>schedule</b> (1)	<b>seth@dereksmithlaw.c</b>
<b>Representing</b> (7)	<b>reviewing</b> (1)	<b>scholarship</b> (1)	<b>om</b> (1)
<b>reprieve</b> (5)	<b>reviews</b> (1)	<b>scope</b> (2)	<b>setting</b> (2)
<b>Republican</b> (3)	<b>revise</b> (1)	<b>screamed</b> (1)	<b>settle</b> (1)
<b>reputation</b> (4)	<b>RICO</b> (6)	<b>screen</b> (9)	<b>settled</b> (1)
<b>request</b> (12)	<b>rid</b> (1)	<b>Screenshot</b> (5)	<b>seven</b> (14)
<b>requested</b> (3)	<b>ridiculous</b> (8)	<b>screenshots</b> (2)	<b>seventh</b> (1)
<b>requesting</b> (1)	<b>RIESER</b> (24)	<b>scroll</b> (2)	<b>severely</b> (2)
<b>requests</b> (6)	<b>right</b> (344)	<b>scrolled</b> (1)	<b>sex</b> (28)
<b>require</b> (2)	<b>rights</b> (2)	<b>scrolling</b> (1)	<b>sexual</b> (74)
<b>required</b> (1)	<b>rises</b> (1)	<b>scuttle</b> (3)	<b>sexually</b> (7)
<b>requirements</b> (1)	<b>Robinson</b> (12)	<b>scuttled</b> (1)	<b>Shardelle</b> (1)
<b>requires</b> (2)	<b>Robinson's</b> (1)	<b>seal</b> (1)	<b>S-H-A-R-D-E-L-L-E</b>
<b>research</b> (15)	<b>rogue</b> (2)	<b>sealing</b> (1)	<b>(1)</b>
<b>reserved</b> (1)	<b>role</b> (7)	<b>search</b> (1)	<b>share</b> (3)
<b>resignation</b> (1)	<b>Roman</b> (124)	<b>second</b> (25)	<b>shared</b> (5)
<b>resolution</b> (6)	<b>Roman's</b> (16)	<b>secondary</b> (1)	<b>Shargel</b> (3)
<b>resolutions</b> (1)	<b>room</b> (20)	<b>secondly</b> (6)	<b>sharing</b> (1)

she'd (4)	sleep (4)	spread (1)	stopped (2)
sheet (5)	slightly (1)	spreadsheet (1)	stopping (3)
she'll (1)	slit (4)	spring (7)	stories (7)
Shikunov (1)	slower (1)	stab (3)	story (12)
shoddy (1)	small (1)	Stacey (2)	strange (2)
short (2)	smaller (1)	staff (28)	strategy (3)
Shorthand (2)	smiles (1)	staffer (1)	Street (5)
shortly (2)	SMITH (12)	staffers (1)	stretched (1)
shot (1)	snarky (1)	stamp (1)	strike (17)
shoulder (1)	social (5)	stand (7)	striking (1)
should've (5)	software (1)	standing (4)	strong (1)
show (25)	solicitation (1)	standoffish (1)	structure (8)
showed (10)	solution (2)	standoffish, (1)	stuck (1)
shown (2)	solutions (2)	stands (1)	stuff (9)
shows (2)	solved (3)	start (10)	stupid (2)
shrugs (1)	somebody (3)	started (19)	style (10)
shuffling (2)	someone's (1)	starting (6)	subject (10)
sic (7)	something's (1)	state (8)	subjected (7)
side (4)	sorry (56)	stated (2)	subjecting (1)
SIDNEY (2)	sort (5)	statement (15)	subjects (1)
sign (9)	sorts (19)	statements (32)	submit (5)
signaled (1)	sought (1)	STATES (6)	submitted (5)
signature (2)	sound (1)	stating (1)	Subscribed (1)
signed (16)	sounds (1)	Station (2)	subsequently (4)
significant (3)	source (2)	stations (2)	substance (1)
signing (2)	south (1)	status (4)	substantial (1)
similar (4)	space (1)	statute (5)	substantive (1)
simple (15)	speak (36)	statutes (1)	successful (3)
simply (5)	speakers (1)	stay (6)	successfully (1)
simultaneously (1)	speaking (13)	staying (1)	sucks (1)
single (12)	speaks (2)	steal (2)	sudden (2)
single-word (1)	special (3)	stealing (1)	suddenly (1)
Sir (7)	specialist (7)	stenographic (3)	sue (1)
sit (5)	specialize (1)	stenographically (1)	sued (1)
sitting (8)	specialized (3)	step (4)	suffices (1)
situation (7)	specific (16)	steps (5)	suggest (4)
situations (2)	specifically (6)	Steve (2)	suggested (4)
six (9)	specifics (14)	Steven (3)	suggesting (3)
sixth (1)	speculating (5)	stick (3)	suggestion (2)
Sixty-two (1)	speculation (1)	stipulate (1)	suggests (1)
skeptical (4)	speech (5)	stipulated (1)	Suite (2)
sketched (1)	speed (1)	stipulations (1)	sum (1)
skilled (2)	spend (8)	stir (1)	summary (2)
skills (1)	spending (2)	stock (1)	Sunday (2)
skip (1)	spent (5)	stocks (1)	supervise (3)
Slack (2)	spew (1)	stole (11)	supervisee (3)
Slacks (1)	splitting (1)	stolen (7)	supervising (1)
slander (2)	spoke (13)	stood (1)	supervision (1)
slandering (1)	spoken (2)	stop (27)	supervisor (13)



supervisors (1)  
 support (2)  
 supposed (10)  
 supposedly (1)  
 sure (56)  
 surprise (4)  
 surprised (1)  
 surprises (6)  
 surprising (1)  
 suspicious (1)  
 swear (3)  
 sworn (4)  
 sympathize (1)  
 systematic (2)

## &lt; T &gt;

table (1)  
 tactics (1)  
 take (70)  
 taken (18)  
 takers (1)  
 takes (1)  
 talk (45)  
 talked (22)  
 talking (73)  
 talks (5)  
 tank (1)  
 tape (1)  
 targets (1)  
 task (1)  
 tasks (3)  
 tax (1)  
 taxable (1)  
 tax-deductible (2)  
 team (1)  
 tech (1)  
 technology (2)  
 Telegram (1)  
 Telegrams (1)  
 telephone (3)  
 television (2)  
 tell (103)  
 telling (25)  
 tells (5)  
 ten (20)  
 tense (14)  
 tension (2)  
 term (1)  
 terminated (2)

termination (1)  
 terms (4)  
 terrible (3)  
 testified (16)  
 testify (12)  
 testifying (8)  
 testimonies (1)  
 Testimony (45)  
 Text (20)  
 texting (1)  
 texts (9)  
 Thank (27)  
 Thanks (5)  
 theft (6)  
 Thelma (3)  
 theory (1)  
 thereof (1)  
 thing (41)  
 things (57)  
 thing's (1)  
 think (169)  
 thinking (3)  
 Third (7)  
 Thirdly (1)  
 thirty (1)  
 this' (1)  
 this-and-that (1)  
 Thomas (12)  
 thoroughly (1)  
 thought (30)  
 thoughts (2)  
 thousand (4)  
 threat (6)  
 threaten (2)  
 threatened (2)  
 threatening (2)  
 threatens (1)  
 three (30)  
 threes (1)  
 three-something (1)  
 threw (2)  
 throat (2)  
 throats (1)  
 thrown (1)  
 Tiffany (9)  
 till (3)  
 time (150)  
 timeline (1)  
 timeliness (1)

timely (1)  
 times (12)  
 time's (1)  
 tissue (5)  
 title (14)  
 today (66)  
 Today's (1)  
 told (80)  
 Tommy (13)  
 tomorrow (3)  
 tooth (1)  
 top (7)  
 topic (5)  
 topics (1)  
 total (1)  
 totally (3)  
 touch (4)  
 touched (1)  
 touching (1)  
 tough (7)  
 toxic (2)  
 tracing (1)  
 track (1)  
 trade (13)  
 traded (1)  
 trading (1)  
 trafficking (9)  
 train (1)  
 transcribed (1)  
 transcript (4)  
 transcription (2)  
 trap (1)  
 trapped (2)  
 travels (2)  
 treasurer (1)  
 treat (2)  
 trespassed (1)  
 trial (1)  
 Tricia (47)  
 Tricia's (2)  
 trick (1)  
 tried (12)  
 trigger (1)  
 trip (9)  
 trouble (7)  
 troubled (7)  
 trouble's (1)  
 troubling (6)  
 true (20)

truly (1)  
 Trust (1)  
 truth (11)  
 truthful (1)  
 truthfully (1)  
 try (24)  
 trying (26)  
 Tuesday (3)  
 Turn (10)  
 turned (9)  
 turning (2)  
 turns (1)  
 TV (2)  
 Twenty-six (1)  
 twice (2)  
 two (63)  
 type (4)  
 types (1)

## &lt; U &gt;

ugliness (1)  
 uh-huhs (1)  
 uh-uhs, (1)  
 UK (2)  
 ultimate (5)  
 ultimately (1)  
 unable (1)  
 unacceptable (1)  
 unauthorized (1)  
 unaware (2)  
 unbearable (1)  
 unchanged (2)  
 unclear (1)  
 uncomfortable (4)  
 underneath (6)  
 underpinnings (1)  
 understand (32)  
 understanding (5)  
 understands (3)  
 understood (6)  
 undertaking (2)  
 underway (1)  
 uneasy (2)  
 unendingly (2)  
 unfair (1)  
 Unfortunately (1)  
 unhappy (8)  
 unilaterally (2)  
 unintelligible (11)

<b>UNITED</b> (4)	<b>viper's</b> (2)	<b>welcome</b> (7)	<b>word</b> (24)
<b>universe</b> (1)	<b>virtually</b> (1)	<b>welcoming</b> (1)	<b>wording</b> (1)
<b>unknown</b> (3)	<b>virtues</b> (1)	<b>welfare</b> (2)	<b>words</b> (11)
<b>unlawful</b> (1)	<b>vis-à-vis</b> (2)	<b>well</b> (201)	<b>work</b> (88)
<b>unpleasant</b> (1)	<b>visit</b> (1)	<b>went</b> (33)	<b>worked</b> (14)
<b>unquote</b> (4)	<b>visited</b> (1)	<b>we're</b> (126)	<b>working</b> (25)
<b>unquoted</b> (1)	<b>vituperation</b> (1)	<b>we've</b> (9)	<b>workplace</b> (9)
<b>unrelated</b> (4)	<b>voice</b> (2)	<b>What'd</b> (4)	<b>work-related</b> (1)
<b>untrustworthy</b> (1)	<b>volatile</b> (1)	<b>What're</b> (3)	<b>works</b> (15)
<b>unwanted</b> (7)	<b>volunteer</b> (1)	<b>WhatsApp</b> (1)	<b>workshops</b> (2)
<b>unwelcome</b> (3)	<b>voyeur</b> (1)	<b>WhatsApps</b> (1)	<b>world</b> (2)
<b>ups</b> (1)	<b>vs</b> (2)	<b>whatsoever</b> (5)	<b>worried</b> (8)
<b>upset</b> (13)	<b>vulgarity</b> (2)	<b>when's</b> (2)	<b>worries</b> (1)
<b>use</b> (13)	<b>&lt; W &gt;</b>	<b>Where'd</b> (4)	<b>worry</b> (1)
<b>useful</b> (2)	<b>W-2</b> (1)	<b>whipped</b> (1)	<b>worse</b> (1)
<b>usual</b> (2)	<b>Wait</b> (14)	<b>whisper</b> (1)	<b>worth</b> (7)
<b>usurpers'</b> (1)	<b>waited</b> (3)	<b>whispering</b> (3)	<b>would've</b> (12)
<b>&lt; V &gt;</b>	<b>waiting</b> (2)	<b>white</b> (3)	<b>wrap</b> (1)
<b>vagina</b> (4)	<b>waive</b> (2)	<b>whitewashed</b> (1)	<b>wrapped</b> (1)
<b>vague</b> (2)	<b>waived</b> (1)	<b>wholesale</b> (1)	<b>wreck</b> (1)
<b>valid</b> (2)	<b>walk</b> (1)	<b>wholly</b> (1)	<b>write</b> (3)
<b>value</b> (14)	<b>walking</b> (1)	<b>who've</b> (1)	<b>writes</b> (3)
<b>variable</b> (1)	<b>wall</b> (2)	<b>why'd</b> (1)	<b>writing</b> (6)
<b>various</b> (4)	<b>wandered</b> (1)	<b>wife</b> (2)	<b>written</b> (12)
<b>vehicle</b> (1)	<b>wanna</b> (66)	<b>WILLIAM</b> (2)	<b>wrong</b> (24)
<b>veracity</b> (2)	<b>want</b> (58)	<b>willing</b> (4)	<b>wrong,</b> (1)
<b>verb</b> (1)	<b>wanted</b> (29)	<b>willingness</b> (1)	<b>wrongly</b> (1)
<b>verbal</b> (2)	<b>wants</b> (20)	<b>willy-nilly</b> (1)	<b>wrote</b> (14)
<b>verbs</b> (1)	<b>warranted</b> (2)	<b>window</b> (1)	<b>&lt; X &gt;</b>
<b>verified</b> (3)	<b>wary</b> (1)	<b>wink</b> (1)	<b>X'd</b> (1)
<b>verify</b> (1)	<b>Washington</b> (6)	<b>wish</b> (9)	<b>XX</b> (5)
<b>verse</b> (4)	<b>waste</b> (2)	<b>wished</b> (1)	<b>&lt; Y &gt;</b>
<b>version</b> (3)	<b>wasting</b> (5)	<b>wishes</b> (1)	<b>Yeah</b> (119)
<b>versions</b> (2)	<b>watch</b> (1)	<b>withdraw</b> (5)	<b>year</b> (18)
<b>versus</b> (1)	<b>watched</b> (3)	<b>withdrawing</b> (4)	<b>yearly</b> (1)
<b>vice</b> (2)	<b>watching</b> (1)	<b>withdrew</b> (2)	<b>years</b> (25)
<b>victim</b> (1)	<b>wax</b> (1)	<b>witness</b> (284)	<b>yelling</b> (1)
<b>video</b> (6)	<b>waxing</b> (1)	<b>witnessed</b> (4)	<b>Yep</b> (26)
<b>videoconference</b> (1)	<b>way</b> (57)	<b>witnesses</b> (5)	<b>yesterday</b> (2)
<b>Videographer</b> (33)	<b>ways</b> (11)	<b>Wolson</b> (6)	<b>Yonchek</b> (6)
<b>Videotaped</b> (1)	<b>web</b> (1)	<b>Wolson's</b> (1)	<b>York</b> (3)
<b>views</b> (3)	<b>website</b> (6)	<b>woman</b> (1)	<b>Yup</b> (9)
<b>VII</b> (1)	<b>week</b> (18)	<b>woman's</b> (3)	<b>&lt; Z &gt;</b>
<b>vindictive</b> (1)	<b>week</b> (2)	<b>women</b> (35)	<b>ZABROSKE</b> (2)
<b>violate</b> (1)	<b>weekly</b> (2)	<b>women's</b> (4)	<b>Zero</b> (1)
<b>violated</b> (2)	<b>weeks</b> (5)	<b>Wonder</b> (1)	<b>Zoom</b> (5)
<b>violating</b> (1)	<b>weigh</b> (1)	<b>wonderful</b> (1)	<b>zooming</b> (1)
<b>violation</b> (2)	<b>weird</b> (1)	<b>wondering</b> (2)	
	<b>weirded</b> (1)	<b>Wood</b> (3)	